



February 8, 2011

JMA Ventures  
P.O. Box 3938  
Truckee, CA 96160

Tahoe Regional Planning Agency  
P.O. Box 5310  
Stateline, NV 89449

**Re: Homewood Mountain Resort DEIS/EIR/Master Plan Public Comment Period**

Dear JMA Ventures and TRPA staff,

The League to Save Lake Tahoe respectfully requests an extension to the public comment period for the Homewood Mountain Resort EIS/EIR/Master Plan. The sixty-day comment period is not a sufficient amount of time for the public to review and comment on this document. The document is thousands of pages in length with multiple attached reports as appendices. Although the document is complex and long, it is also incomplete; additional information has been requested by the public, in the form of a FOIA request.

We are requesting that at least an additional 30 days are given for public comment to allow the public at least a total of 90 days to review the document.

Thank you,

Melissa Thaw  
Associate Program Advocate  
League to Save Lake Tahoe

# McKinney Bay Improvement Association, Inc.

California non-profit organization/Entity number 0325061

**Gordon Strachan**  
President

**Loyd Hutchins**  
Vice-President

**Ralph Peer**  
Secretary/Treasurer

**Dado Banatao**  
**Barbara Brochard**  
**T.G. Fraser**  
**Loyd Hutchins**  
**Ralph Peer**  
**Gordon Strachan**  
Directors

April 20, 2011

Tahoe Regional Planning Agency  
P.O. Box 5310  
128 Market Street  
Stateline, NV 89448  
Contact: David Landry, Project Manager  
Phone: (775) 589-5214  
Fax: (775) 588-4527  
Email: [homewooddeiscomments@trpa.org](mailto:homewooddeiscomments@trpa.org)

County of Placer  
Community Development Resource Agency  
Environmental Coordination Services  
3091 County Center Drive, Suite 190  
Auburn, CA 95603  
Contact: Maywan Krach, Community Development Technician  
Phone: (530) 745-3132  
Fax: (530) 745-3080  
Email: [cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov)

RE: Homewood Mountain Resort Ski Area Master Plan CEP Project,  
Draft Environmental Impact Report/Statement

Dear TRPA Governing Board and Placer County Board of Supervisors,

I write on behalf of the McKinney Bay Improvement Association Inc., a 56-year old Homeowners group. All of our members own property in Tahoma, approx. one mile southeast of Homewood Mountain Resort and are thus directly impacted by the proposed development project. Below we choose to focus on the points of most interest to our membership. Silence on the many remaining points in the overwhelmingly-large EIR/EIS does not imply agreement or approval of the remaining items.

1 [ We support a development of smaller size and less impact which complies with the building code.

**MBIA**  
**95 Harbor Drive**  
**Novato CA 94945**

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## 1) Character of our Neighborhood –

2 [ We feel that the proposed project (alternative 1) is out of scale and character for the west shore in general (Tahoe City to Emerald Bay State Park) and for our neighborhood of McKinney Bay in particular. ] This would be by far the largest project ever approved for this sector. [ Its impact on the environment, both ecological and scenic, is magnified by its close proximity to the lake shore and the 2-lane road which all visitors & residents must traverse. ] We have worked for years to keep the west shore as a low impact environmental area for the sake of future generations. Once a project of this size is allowed it is inevitable that there will be pressure for ancillary building including road improvements. Such development will make this valued stretch of lakeshore a commercial hotbed, potentially leading to buildup such as seen on the north shore today. An extensive new mountain resort within this relatively undeveloped portion of the fragile Tahoe basin is an unnecessary incursion. There are ample recreational alternatives both within and outside of the Tahoe basin. Should it be built to the proposed plan, there will never be an opportunity to regain the current muted character of the west shore which is valued by visitors and residents alike. ]

5 [ Now that the West Shore Café with its lake front is part of the commonly controlled property there will be numerous pedestrian crossings of SR89 in Homewood, likely resulting in the only traffic signal in this entire stretch of the West Shore. This would be an unwelcome change in neighborhood character. The change in ownership of the café needs to be taken into account in your consideration of this project. ]

## 2) Transportation: Traffic and Associated Emissions –

6 [ The development of HMR in the size and configuration presented in the EIR/EIS on the very edge of Lake Tahoe will create a traffic nightmare and contribute substantially to pollution in the Basin. ] The proposed "Mitigation" is illusory as it will not erase the fact that hundreds of additional cars and people will be concentrated on a two lane road during both the summer and winter. Humans will want to drive their families and their skis right up to the front door in the winter. They will want to get as close to the lake as possible during the summer. Traffic and delays with the attendant additional emissions will become frequent realities as is evidenced by the many "significant impact" conclusions in section 11 of the EIR/EIS (e.g. table 11-21 analysis) even after inclusion of the putative mitigation projects. That projects #1 and reduced size alternative #6 are presented as having the same traffic impact is incomprehensible.

**MBIA**  
**95 Harbor Drive**  
**Novato CA 94945**

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# McKinney Bay Improvement Association, Inc.

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## 3) Rejection of Other Alternatives –

We note the developer has rejected other reduced size alternatives which they included in this analysis. We refer to these only to the extent that the developer may extend similar argumentation to any smaller size project.

9 [ The rejection of the "reduced size alternative" (number 6) (EIS/EIR 3.4.1) appears to rest solely on the financial argument that it does not "achieve the number of skier visits needed during the winter mid-week period" which are needed "in order to generate sustainable revenues and at a minimum cover the cost of operations." Isolating these figures from the remaining financial potential is artificial. While we believe it is appropriate for private projects to be financially viable, the financial results from mid-week ski users should not rank high in the public policy decisions you are making in considering the approval or disapproval of the proposed project.

10 [ Not having access to the relevant financial information we cannot consider the argument of the developer upon which this key rejection rests. If you place weight on these arguments, we urge that the TRPA engage neutral financial expertise with authority to delve deeper into the financial information. Questions might include: How are revenues calculated for season passes? How are ancillary revenues factored in, most particularly from condominium sales?

## 4) Scenic Incursion –

11 [ In addition to the size and height of the base buildings (being larger and taller than any others on the west shore), we have great concern about the scenic impact of the Mid-Mountain Lodge and support facilities. To prevent this visual travesty we urge complete shielding be required so that the building and support facilities as well as ski lift operations are not visible from the Lake.

## 5) Light Splash –

12 [ Our members are concerned about light pollution from this project. Exterior illumination should be kept to a minimum and should be designed to eliminate or minimize any upward light and/or any light visible from the lake.

... 4

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## 6) Story Poles –

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We support a requirement for story poles to be in place this summer (before project approval) to facilitate a visualization of the scale and mass of the development. The larger buildings at both the North and South base area as well as the Mid-Mountain project need to be seen in scale up to the roofline.

## 7) Buoys –

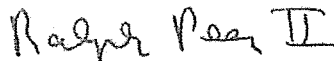
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We also feel it would be appropriate for TRPA to require, as a condition to any permits issued, that the developer on behalf of itself and its associated and commonly-controlled corporations, agree to remove any untagged buoys in McKinney Bay that now or in the future come under their control. This project together with the newly acquired West Shore Café property will have the effect of providing direct lakeshore and private pier access to the many new condominium residents with attendant pressure on the already large buoy field.

We trust you will take the concerns of the MBIA Homeowners into consideration as you review this project.

Sincerely,

MBIA



Ralph Peer  
Secretary

c.c. Byron Sher, [byrondsher@sbcglobal.net](mailto:byrondsher@sbcglobal.net)  
Mara Bresnick, [mara.j@att.net](mailto:mara.j@att.net)  
Norma Santiago, [norma.santiago@edcgov.us](mailto:norma.santiago@edcgov.us)  
Clem Shute, [shute@smwlaw.com](mailto:shute@smwlaw.com)  
MBIA Board of Directors

MBIA  
95 Harbor Drive  
Novato CA 94945



April 20, 2011

Tahoe Regional Planning Agency Governing Board  
P.O. Box 5310  
Stateline, NV 89449

Re: Homewood Mountain Resort Ski Area Master Plan

To the Tahoe Regional Planning Agency Governing Board,

As the Chair of the North Lake Tahoe Resort Association and North Lake Tahoe Chamber of Commerce Board of Directors, I am writing today to express both organizations' support for the proposed Homewood Mountain Resort Ski Area Master Plan (HMR).

As stated in the Resort Association's *North Lake Tahoe Tourism Development Master Plan*, the North Lake Tahoe region needs investment in its aging infrastructure. Not only because these blighted areas cause significant environmental harm, but also because deteriorating and substandard infrastructure contribute to our declining tourist market. HMR represents the type of infrastructure investment North Lake Tahoe needs to reverse this declining trend.

The existing Homewood ski area is tired and dysfunctional. It meets none of today's advanced environmental standards and is no longer economically sustainable. After careful consideration of the Environmental Impact Report and other related materials, we support the manner in which HMR provides enhanced environmental benefits in accord with the Community Enhancement Program. This sustainable plan will include workforce housing, and the removal of expansive asphalt parking, allowing for extensive land restoration at the base areas. We also support the economic enhancements proposed, including the generation of jobs and the provision of amenities unavailable elsewhere on the West Shore.

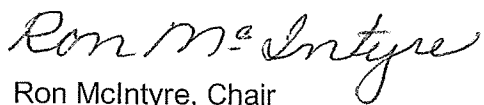
HMR has been developed in accordance with the gold level criteria of the US Green Building Council LEED program and could serve as a prototype for energy efficiency building in the alpine environment. Today's traveler is a smarter traveler and many are looking for options including a low carbon footprint and a commitment to environmental stewardship. HMR's green design, storm water mitigations, and commitment to alternative transportation, on land and water, will lead the transition to the long term economic and environmental health of the West Shore and North Lake Tahoe region.

The need for these types of transitions and expansions of economic opportunity is well documented in the *Lake Tahoe Basin Prosperity Plan* and the NLTRA master plan.

In addition, in reviewing the Lake Tahoe TMDL, the Lake Tahoe Environmental Improvement Program, and the Lake Tahoe Restoration Act of 2009, it is clear we will not be able to meet our environmental goals, consistent with the Compact, without the investment of the private sector. The proposed Homewood Mountain Resort Ski Area Master Plan represents an appropriate opportunity for private sector investment at Lake Tahoe.

Thank you for your consideration of the North Lake Tahoe Resort Association/Chamber of Commerce opinion on the proposed Homewood Mountain Resort proposal.

Sincerely,

A handwritten signature in cursive script that reads "Ron McIntyre".

Ron McIntyre, Chair  
Board of Directors  
North Lake Tahoe Resort Association  
North Lake Tahoe Chamber of Commerce

21 April 2011

**Tahoe Regional Planning Agency**  
P.O. Box 5310  
128 Market Street  
Stateline, NV 89449  
Attention: David Landry

**County of Placer**  
Community Development Resource Agency  
Environmental Coordination Services  
3091 County Center Drive, Suite 190  
Auburn, CA 95603  
Attention: Maywan Krach

**Homewood Mountain Resort Ski Area Master Plan, CEP Project, Draft Environmental Impact Report/Statement (DEIR/DEIS)**

Dear TRPA & County of Placer,

The North Tahoe Citizen Action Alliance (NTCAA) seeks to provide an ongoing voice for ordinary citizens. Planning for the future of our communities and providing for communication and education on key issues affecting our communities is of prime importance. We serve the North Lake Tahoe area from Kings Beach to Tahoma, and over time will expand to serve other areas of Eastern Placer County adjacent to the Lake, such as Squaw Valley, Alpine Meadows and Northstar communities.

NTCAA supports community development strategies that eliminate blighted conditions, influence the expenditure of public funds, integrates community projects for the public good, develops innovative solutions, and promotes a diversified economy. Furthermore, we strive to enhance community pride by contributing to the well conceived revitalization of buildings, infrastructure, and recreational facilities; improving our natural environment; maintaining a high quality of life and supporting a table and self-sustaining economy.

1 NTCAA supports a renovated and improved Homewood Mountain resort that is true redevelopment, that is, rehabilitation of already existing buildings on the existing footprint that improves and enhances the community. 2 The proposed project is too large for the site and is not compatible with the long-standing community character of Homewood and the West Shore. Moreover, the project's proposed density, height, increase in traffic and change in groundwater run-off would all be detrimental to the environment and community character. 3 We would support an alternative that is much smaller and complies with all current building codes and follows TRPA's CEP criteria. There are two areas of significant concern.

**No Code Amendments**

4 The CEP states on page 3, "The CEP is not a code avoidance program." As a CEP demonstration project, the HMR project should follow the CEP guidelines and code amendments should not be permitted. This proposed development would require amendments on height, multi-family residential use and change in the interception of groundwater, all of these having a major impact on the size and scale of this development. The tallest proposed height is 4 ½ stories and these buildings would be the tallest on the West Shore.

Homewood does not have a community plan or an adopted General Plan by TRPA. This makes it even more important that this development honor the existing urban growth boundaries and remain within the PAS designated residential, commercial and tourist accommodation boundaries in Homewood. Also, an amendment to Ch. 64- Grading, of the TRPA code to allow the interception and diversion of the natural groundwater run-off should not be permitted. See DEIR/DEIS, p. 3-46. What is the purpose of having codes if they can so easily be circumvented?

### Traffic and Congestion

The traffic analysis seems extremely optimistic considering the expected population increase of at least 1,000 people and 500 cars at peak times. Highway 89 is only a 2-lane road and West Shore residents and visitors are all fully aware of the traffic back-up in the summer going north to Tahoe City. The increase in population and cars will only exacerbate this traffic congestion and also cause air and water pollution from increased Vehicle Miles Traveled (VMTs).

Furthermore, HMR will be paying an air quality mitigation fee to offset pollution impacts. However, these pollutant impacts cannot be mitigated by paying fees. The only way to truly mitigate pollution from traffic is to reduce the number of units and vehicles.

### Conclusions

The NTCAA does not support over-development but supports a Homewood development that is compatible with the environment and the rustic quality of Homewood and the West Shore. Please consider the concerns of the community and our concerns as expressed in this letter in your decision-making process.

To summarize, NTCAA wishes to see the following changes to the HMR proposed project:

1. A significant decrease in the number of units to reduce density, height, traffic and environmental impacts.
2. No development on vacant land – redevelopment only on current built-out land.
3. No amendments to current code requirements

Thank you for consideration of our comments.

Sincerely,



For NTCAA Board Members:

Jerry Wotel, President  
Dave McClure, Vice President  
Susan Gearhart, Board Member  
Paul Vatistas, Board Member

Tahoe Regional Planning Agency  
 P.O. Box 5310  
 128 Market Street  
 Stateline, NV 89448  
 Contact: David Landry, Project Manger  
 Phone: (775) 589-5214  
 Fax: (775) 588-4527  
 Email: [homewooddeiscomments@trpa.org](mailto:homewooddeiscomments@trpa.org)

April 21, 2011 18

County of Placer  
 Community Development Resource Agency  
 Environmental Coordination Services  
 3091 County Center Drive, Suite 190  
 Auburn, CA 95603  
 Contact: Maywan Krach, Community Development Technician  
 Phone: (530) 745-3132  
 Fax: (530) 745-3080  
 Email: [cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov)

Re: Homewood Mountain Resort Ski Area Master Plan, CEP Project, Draft  
 Environmental Impact Report/ Environmental Impact Statement

Dear Members of the Governing Board, TRPA Staff and County of Placer,

The North Tahoe Preservation Alliance (NTPA) registers its opposition to the Homewood Ski Area expansion which proposes to add substantial new development, including approximately, including approximately 349 new units, over 1400 new overnight guests (peak activity) approx. 180 employees, 25,000 square feet of commercial area, a 272 space three level parking structure, a 15,000 sq. ft. mid-mountain lodge, a 30,000 sq. ft. skier services lodge, 75 hotel rooms, 40 2-bedroom for-sale condo units, 30 penthouse condo units, 36 residential condominiums, 16 townhouses, 20 fractional ownership units, 13 affordable housing units, a health spa, ice skating rink, 18 hole miniature golf course, three swimming pools, and 99 additional condos at the South Base. DEIS 3-17-19.

1 [ In particular, we are concerned about the proposed project's size and scale, excessive height, lack of compatibility with the community character, increased traffic and the proposed code amendments.

2 [ We feel that the DEIR/S fails to forthrightly disclose the significant and cumulative environmental impacts of a project with the numerous amendments to the three Plan Area Statements, to the Code of Ordinances, and to the Regional Plan Goals and Policies. Furthermore we hold reservations about the precedent that projects, such as Homewood, Boulder Bay and others set for future Tahoe development.

We look forward to a revised DEIR/DEIS that accurately portrays the impacts regarding the project.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ann Nichols".

Ann Nichols, NTPA

*preserve@ntpac.com*

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Reply Reply All Forward

**Fwd: Homewood DEIS Comments from the TASC**

Laurel Ames [laurel@watershednetwork.org]

**Sent:** Thursday, April 21, 2011 4:54 PM

**To:** Homewood DEIS Comments; cdraecs@placer.ca.gov; David Landry

**Attachments:**  TASC HMR DEIR-DEIS Final C~1.pdf (2 MB) [Open as Web Page]

----- Original Message -----

**Subject:** Homewood DEIS Comments from the TASC

**Date:** Thu, 21 Apr 2011 16:46:27 -0700

**From:** Laurel Ames <laurel@watershednetwork.org>

**Reply-To:** laurel@watershednetwork.org

**To:** Homewooddeiscomments@trpa.org, cdraecs@placer.ca.gov, dlandry@trpa.org





Tahoe Regional Planning Agency  
Governing Board Members and TRPA Staff

April 21, 2011

*Sent via email to Project Contact: David Landry ([dlandry@trpa.org](mailto:dlandry@trpa.org))*

County of Placer, Community Development Resource Agency  
Environmental Coordination Services

*Sent via email to Project Contact: Maywan Krach ([cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov))*

**Subject: Response to Draft Environmental Impact Report/Statement (DEIR/DEIS) for the Homewood Mountain Resort Ski Area Master Plan CEP Project.**

Dear Governing Board Members and TRPA staff,

[We would like to thank you for the opportunity to comment on the Draft Environmental Impact Report/Statement (DEIR/DEIS) for the Homewood Mountain Resort (HMR) Ski Area Master Plan CEP Project (hereafter "Project"). As we have stated in the past, we are concerned with the extent of proposed development under the CEP program, and call out again that the CEP program should at most, include one or two small 'demonstration' projects aimed at testing new and unique development concepts for their ability to help achieve thresholds. However, TRPA has approved the reservation of extensive allocations and commodities for several very large redevelopment projects that are being reviewed under the existing Regional Plan (well recognized as inadequate and out of date) while the update remains overdue. We reiterate our concerns with the CEP program as it has proceeded and believe that TRPA should first focus on updating its Regional Plan to reflect existing conditions and science, rather than permit the redevelopment of most urban areas in the Basin under a flawed set of regulations. It is clear that the Regional Plan intends that each community should first have a community plan in place before TRPA allows large projects to be dropped on small rustic communities. Equally TRPA should not be proposing amendments to its Code of Ordinances as a way of ignoring local Plan Area Statements.

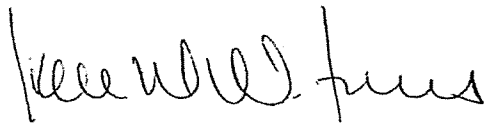
With respect to the HMR project, we appreciate the owner's interest in making environmental improvements to the project area, and are impressed with load reductions resulting from existing and previous improvements on the mountain such as legacy road restoration. We previously discussed the project with the owner and learned of several promising environmental improvements being considered for the project area, and agree, along with many residents, that there is a need for some type of redevelopment at HMR. However, based on our review of the DEIS documentation, we have many concerns with the project, including the large scale of the Project relative to its location and the impacts it will create, both within Homewood, in surrounding communities, and Basin-wide.

We provide the following comments and questions to guide the information and analyses conducted in the drafting of the FEIS. We also hereby incorporate comments submitted by the League to Save Lake Tahoe, Friends of the West Shore and letters from interested stakeholders.

Please feel free to contact

Ronald Grassi at [ronsallygrassi@mac.com](mailto:ronsallygrassi@mac.com) or Laurel Ames at [laurel@watershednetwork.org](mailto:laurel@watershednetwork.org) if you have any questions. ]

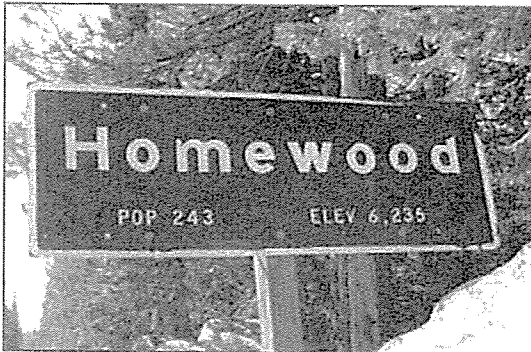
Sincerely,



Ron Grassi, Esq. (Retired)  
*Conservation Co-Chair*  
Tahoe Area Sierra Club

Laurel Ames  
*Conservation Co-Conservation*  
Tahoe Area Sierra Club

2 [First, we note that our comments generally focus on the proposed developments at north and south base, the area in between and at the mid-mountain lodge. As expressed in our cover letter, we recognize the beneficial work HMR has been doing throughout the rest of the resort (i.e. "on the mountain") to restore legacy roads, reduce overall sediment loading from the mountain, reduce forest fuels and improve forest health in compliance with existing regulations. Therefore, our concerns regarding environmental and community impacts are focused on the bases (and mid-mountain) areas and how they will be developed.]



### 3 [ I. Failure of DEIS to Adequately Analyze Impacts of Proposed Density:

Density increases proposed by this project are one of the biggest factors that will affect the West Shore environment. The addition of new trips per day, based on the additional number of attractors and housing will adversely impact traffic, current air quality and other thresholds and the community of Homewood (by adding thousands of residents and guests to a very small community resulting in a 36 % increase in total population. The project proposes to add substantial new development, including approximately 349 new units, over 1400 new overnight guests (peak activity)<sup>1</sup> approx. 180 employees, 25,000 square feet of commercial area, a 272 space three level parking structure, a 15,000 sq. ft. mid-mountain lodge, a 30,000 sq. ft. skier services lodge, 75 hotel rooms, 40 2-bedroom for-sale condo units, 30 penthouse condo units, 36 residential condominiums, 16 townhouses, 20 fractional ownership units, 13 affordable housing units, a health spa, ice skating rink, 18 hole miniature golf course, three swimming pools, and 99 additional condos at the South Base. This proposal is substantial in itself, but more so in a community with about 400 year round residents. See DEIR/DEIS, p. 3-17 – 3-19

Smart Growth: While the Sierra Club generally supports the concept of smart growth for dense, populated urban areas where it will offset future development on the urban fringes, but with recognition that this is not appropriate everywhere, nor is there a "one-size-fits-all" design. With regards to Homewood, there is a need for some type of redevelopment at the project site, however, the increased density proposed for this very small community is neither appropriate, nor 'smart,' for the area.]

4 [The TASC recommended in our NOP comments, alternatives that would better match the character and scale of the Homewood community are preferable. The alternatives proposed in the DEIR/DEIS do not include an environmentally preferred alternative, and dismiss the one effort that is closest (DEIR/DEIS Alt. 6) as unable to "meet the minimum

<sup>1</sup> HMR should be required to provide the estimated number of people the project will bring to Homewood prior to the submission of the FEIS. Because this has not been required, we have estimated this based on unit and bedroom information provided.

number of residential/tourist accommodation units required for HMR to feasibly achieve the number of skier visits needed during the winter... to ensure the continued viability of the ski operations.” DEIR/DEIS, p. 3-11. Ensuring the continued viability of the ski operations is not an adequate rationale for eliminating the alternative with the least environmental impact. ]

[ II. **Community Scale and Character:**  
**The DEIR/DEIS Fails to Assess the Community Character and Scale of the Homewood Area and Fails to Follow the TRPA Regional Plan Regulations**

Community Scale and Character:

5 Regional Plan PAS 157 includes Special Policy 1: “A coordinated Homewood Community Plan should include this Plan Area as well as Plan Area 159.” PAS 159 includes the following Planning Statement: “This area should continue to be a tourist commercial area. However, there is a need for rehabilitation while maintaining the scale and character of the west shore.” PAS 159 also includes special policy 5: “Tourism and recreation compatible with the west shore scale of development should be encouraged in this Plan Area.”

The requirements here are very clear – any development in Homewood must be consistent with the scale and character of the community. In fact, TRPA and the developer recognize this. The DEIR/DEIS states that one of the project objectives is to “Maintain consistency with the scale and character of Homewood, CA.” DEIR/DEIS, p. 3-9.

However, there has been much debate regarding the intent of requirements to maintain the scale and character of a given area. Without a community plan to determine what the scale and character of the Homewood community is, we must rely on fact: the “scale” of Homewood is a very small community of 906 permanent residents (DEIR/DEIS, p. 7-2) and the “character” of Homewood is a small, mountain rural and rustic town with limited commercial facilities. Additionally, the West Shore is treasured as one of the last places where “old Tahoe” can be found due to its unique, rural, rustic and quiet atmosphere.

In fact, TRPA said as much in the August 2008 Governing Board (GB) packet. The GB discussed the issue of “community character and scale” during this meeting. Although the discussion was raised based on impacts from residential development, the core issue is still the same: how to assess if proposed development is consistent with a community’s character and scale. TRPA’s conclusion as stated in the ‘white paper’ in the packet agreed with our read of the Code that the community should develop their community plan first: “...Given the number and variation of programs and policies out there, it is evident that there is no “silver bullet” solution. Each community must define community character, identify its specific issues, the context and area to which such regulations would apply, and resources availability to manage such programs.” TRPA (p. 229, 8/08 GB Packet).

TRPA has not performed any public process per the Code (Ch. 14) to adopt a CP which otherwise defines the scale and character of Homewood. The Homewood Mountain Resort (HMR) owners held numerous meetings with people in west and north shore communities which is appreciated, but does not substitute for the Community Plan process. TRPA will simply not be able to make the findings that this project is consistent with the scale and character of the Homewood community in the absence of an existing Community Plan that has been developed following the guidelines established in Chapter 14 of the Code of Ordinances. Here TRPA expects to avoid the extensive community input required in 6.A and B by falling back on their alternative under 14.6.E "If TRPA finds that an alternate process to Subsections 14.6.A and 14.6.B would better facilitate the planning process while still meeting the objectives of this chapter, a modified process may be approved provided community input is included as a component of the modified process. Section 14 E"

But the modified process that was used – developer-managed meetings, removed the community input as designed in chapter 14 for the necessary and thorough community input in lengthy work sessions, over many months and substituted a pale shadow of the well-used process for other community plans.

In addition, in August 2008, several members of the Homewood Homeowners Assn (including the President and another officer) and Friends of the West Shore met with Placer County regarding initiating and executing a Community Plan. On August 26, 2008, a letter from Placer County to John Singlaub, Executive Director of TRPA and Mara Bresnick, Chair of the TRPA Governing Board, advised that "At such time that the Regional Plan has been adopted, Placer County will then consider the appropriateness of possible amendments to the County's Community Plans. Placer County will embark on updating the Community Plans only after the Regional Plan update is complete".

Further, the NOP packet explained: *"changes to the current policies and procedures that would increase the regulatory control of community character will require a comprehensive review of current Basin conditions and regulations from other jurisdictions, significant analysis of policy/economic/social consequences, robust public involvement and debate. Such an important policy and regulatory changes are, in staff's view, most appropriately addressed as part of the Regional Plan Update. In addition, any proposed policy change can be analyzed and reviewed in the larger context of other related issues and policy shifts."* The TASC agrees. TRPA was on the right track before it did a double-take and swerved onto the wrong track. ]

6 [The failure to heed the staff's recommendation exposes yet another problem with the proposed project, as well as the overall CEP program. **If this project is approved as proposed, without benefit of a Community Plan being completed first, Homewood's 'character and scale' will be forever significantly changed from a rustic small community to an overbuilt resort that benefits the developer at the expense of the community.** The project is about the developer's vision, and is not respectful of the rural community. This is clearly demonstrated in the DEIR/DEIS's explanation of the Alternative selection criteria. The DEIR/DEIS assets "reduced size alternatives proposed for fewer units than Alternative 6, which only has 282, have been rejected from further

consideration.” DEIR/DEIS, p. 3-11. The new Regional Plan (RP) EIS, after examining the existing condition of Homewood, would show that a project which increases the population of a community by 25 to 30% and brings in this extent of development to a small rural area is not consistent with that area’s character and scale. But by then it will be too late, as TRPA will not require the project to be un-built.

Community Plan (CP) Should be Completed First:

TRPA has never gone through the CP required review process to determine “community desires” or the level of development appropriate for this community because TRPA has not developed a CP for Homewood or any West Shore communities, nor does TRPA intend to develop a CP for this area prior to allowing this significant smothering of the existing community population. Instead, the developer for the Project is preparing his own Master Plan outside of the TRPA process to protect communities but this plan is devised to meet the needs of the developer’s Project and not that of the community. Reliance on a developed initiated Master Plan as the overarching planning documents violates Plan Area Statement (PAS) 157, which states that any significant commercial development in this area be permitted only pursuant to an adopted Community Plan that incorporates and considers the adjoining commercial areas covered by PAS 159. The proposed Project also violates PAS 157 by exceeding the maximum densities allowed as well as the prohibition against new commercial facilities up the mountain.

TRPA Code § 14.6, the development of a Community Plan includes an initial assessment, which “*shall include a survey of existing conditions, an initial needs and opportunities study, a survey of applicable standards and constraints, and a determination of community goals and objectives.*” From this information the preliminary plan shall be developed, which is to identify “*themes*” for the community plan, which may range from “*major retail and services*” to “*local and minor recreation serving retail and services*” or “*minor tourist accommodation.*” Community Plan preparation shall include the “*establishment of baseline information about the location, amount, and condition of all threshold-related elements applicable to the community plan.*” See Section 14.6.C(2). TRPA is required to refine the inventory and needs assessment for the community, which includes determining “*the amount, type, and condition of the inventory of commercial floor area, housing, public service facilities (including transportation facilities) and recreational facilities, commercial, housing, public services, and recreational facilities needed to meet the community goals, with priorities for each and a description of environmental improvement projects needed in the area to meet environmental thresholds.*” See Section 14.6.C(3).

Furthermore, the Regional Plan notes “The redirection of development designation is designed primarily to improve environmental quality and community character by changing the direction of development or density through relocation of facilities, rehabilitate or restoration of existing structure and uses, and *limited new development.*” RP, p. II-4

The Sierra Club does not feel that the Homewood project encompasses “limited new development” as stated above, or that the project will “improve environmental quality and character.” The magnitude of the proposal will completely overwhelm the

surrounding West Shore community with its size and lack of compatibility. Thus, we come full circle: From PAS 157, Chapter 14, the non-existent CP and the Regional Plan.

CONCLUSION: The Fast Shuffle- From PAS 157 to CP to CEP to SAMP (Ski Area Master Plan) to the Project Violates the Regional Plan, Violates the intent of the bulk of Chapter 14, and is arbitrary and capricious on the part of the TRPA.

This is a classic case of an agency captured by a special interest. First we had consistent order, then we had the developer and the agency lose all sight of its mission, its commitments to communities, and its obligations to meet what the TRPA characterized after extensive surveys, as "The goal to keep Tahoe a rural, wild place that is unlike surrounding cities and metropolitan areas" (TRPA website report on Pathways results of "public opinion research documenting the public's vision for Lake Tahoe in 2027 as part of PATHWAY 2007.")

In the current Regional Plan, there is a clear path for development in the basin comprised of the Code, the PAS and the Community Plan process. Faced with a developer who wanted a vision of an investment in a large, multi-season resort, the agency accommodated the developer by placing the rustic and rural area in the new and controversial CEP process in 2008. ]

[ In the CEP process, the concept does not amend the Regional Plan, it is arrogantly superimposed on the Plan as if it were in compliance with all the rules and regulations in existence at the time. But it is not in compliance with the Plan, it is a significant policy change, sold as a pseudo-amendment to the Plan. The agency did not even respect their own processes enough to prepare an environmental document analyzing the impacts of nine large projects that would be given Code amendments in order to accommodate their construction.

7 Thus, Homewood Mountain Resort did not comply on paper with the CEP because, according to the staff report, one of the criteria for CEP – located within "an urban core area" - was not available. But, CEP criteria were conveniently ignored by the agency and the resort was included in the CEP anyway. We note that TRPA has *never* before characterized Homewood as an "urban core" in the Basin. Then, to complicate matters, the first sleight-of-hand in the shuffle, there was the problem of the non-existent Community Plan. That hurdle for the developer was quickly overcome by the agency designating the development a Ski Area Master Plan area. Thus the second shuffle movement from CEP to SAMP.

And then, of course, the last step in the Regional Plan override – from the SAMP to the Project in one easy title change. In short, the agency decided to drop a large-scale Ski Area Master Plan on top of a small neighborhood ski area and community in order to meet the developer's vision and not the carefully worked out process with all the community as required by the Community Plan process.

The TRPA efforts to elevate the project above and beyond the community and focus on a developer's vision constitutes an egregious betrayal of the agencies' own plans, of their own planning processes and advertises their own, created-on-the-fly, unprecedented CEP process to avoid those same plans, rules and regulations. The community will cease to exist as the agency prostrates itself to the developer's next vision of a multi-watershed, ski lift-connected series of ski runs to another ski area six miles away as the crow flies.

The TRPA process that permits this overwhelming change that envelopes the PAS, the CP and uses the CEP to do more than was ever previously envisioned is not only a process that turns the Regional Plan on its head, it is a calculated decision by the TRPA to do just that, without declaring that the action amends the Regional Plan. The fact that the above described process is a code-avoidance strategy is documented clearly in the list of code amendments that are required to support the developer's preferred alternative and is certainly arbitrary and capricious. (p. 3-42 -47, Section 3.5.25, HMR DEIR/DEIS-listing eighteen changes to the PAS and Code of Ordinances, and three changes to the Regional Plan Goals and Policies.)

Instead, the project is simply a developer initiated project that will radically alter the character of the existing Homewood community from local low density residential and local small commercial establishments to a high density, tourist destination location akin to recent developments in Squaw Valley or Northstar. Many Homewood residents have clearly expressed disagreement with the concept and feel that their community is not an "urban core" area appropriate for high density, high activity development. In fact, the DEIR/EIS p. 7-1 states "Homewood (zip code 96141) has the second smallest population in the basin with 906 residents". No previous TRPA documents had ever contemplated such a wholesale slaughter of an old Tahoe community. □

8  
□ In summary, this project will overwhelm the existing community through increasing Homewood's permanent population by 327 (DEIR/DEIS, p. 7-18) a 36% increase. Yet, the DEIR/DEIS also presents another figure when it discusses Alt. 1 in relation to the *Growth-Inducing Effects of the Proposed Action and Alternatives* stating "this increase [from Alt. 1] in population would likely be, at a maximum, approximately 471 persons." DEIR/DEIS, p. 20-14. □

9  
□ Detailed comments and argument on the failure to follow the PAS/CP planning process of the Regional Plan and the failure of the DEIS to analyze the resulting impacts:

- First, TRPA must follow its own advice per the staff summary presented for the August 2008 meeting [discussed above] in that a Community should define its own character and scale and first initiate the development of a Community Plan for and by the Community of Homewood as a separate process that is completed and adopted *prior to* further development of the EIS process.
- Second, HMR should follow their stated principles in the DEIR/DEIS Page 3-9 of the DEIR/DEIS states that one of the project objectives is to "maintain consistency with the scale and character of Homewood, CA." and also noted on Page 5 of the NOP, which states:



*"The overall density of the proposed HMR Master Plan is guided by three principles or objectives that developed as a result of extensive input from the West Shore communities. These principles include:...Consistency with the scale and character of Homewood, CA."*

Furthermore, we note on page 14 of the Initial Study, the "Discussion – Items IX-1,6,8:", states that *"The proposed project is the revitalization of an existing ski resort. There is a residential component of this project, but the ski resort area itself is not expanding in an area such that it would divide an established community or its physical arrangement. There will be improvements made to update the components of the resort, similar to what many surrounding resorts have been doing in recent years."*

TASC notes that surrounding resorts other than Heavenly and Incline are NOT in the Tahoe basin. Heavenly has a SAMP adopted years ago. Incline is a community-owned ski area – changes would be subject to the desires of the community. Outside of the Basin, Squaw and Northstar have constructed big expansions, especially of housing. Their experience is instructive, as Northstar's Ritz Carlton was sold out of bankruptcy, and at Squaw, luxury condos were being auctioned at fire-sale prices last week. There is expansion and then there is overbuilding the market. □

□ Additionally, the DEIR/DEIS states on p. 6-28, "The ski resort has a large impact on the character of the adjacent residential neighborhood."

- 10
- This statement is significant. The DEIR/DEIS must explain how increasing the population of an established community by 100%, and thereby disrupting the permanent community population, through the 10-year construction phase of a massive scale development in a central portion of the Homewood community will not impact the community and its character. Physically, the geography of the Homewood area clearly forms a community that is relatively 'linear' – this proposal is located roughly in the middle of that community, clearly dividing the north from the south end of Homewood. (See DEIR/DEIS, figure A1, p. 23, Appendix AA, Water Supply Assessment)

Further, the reference DEIR/DEIS South Base summary noting that the area will be converted to "a neighborhood residential area" seemingly implies that the residential part of this project is a relatively minor component (compared to the ski resort 'upgrade').

- This statement is misleading. The project proposes to add almost 275 new residential units, 99 of which will be located on the South Base.<sup>2</sup> (DEIR/EIS p. 3-18 to 19). In fact, the project would require an amendment to PAS 157 because it does not currently allow multi-family residential dwelling units. Clearly, the residential component of this project is in fact one of the key additions from this project, not merely a small side component.

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<sup>2</sup> Of the 349 new units, 75 are proposed for the hotel.

- Additionally, the wording in this statement would suggest that this is a simple “ski resort upgrade” – this is also misleading. This is a massive and significant development of the two existing ski resort bases, land in between those bases, as well as the mid-mountain areas. This is far more than a simple increase or improvement to a ski resort. And finally, the owners refer to this project as ‘*similar to what many surrounding resorts have been doing in recent years.*’

NOTE: Surrounding resorts are NOT doing this at Tahoe, which is an area of national significance and is regulated by restrictive rules that protect a National Treasure.

- Based on the proposed project, their statement only reiterates our concerns – this level of development may be appropriate at other larger ski resorts in more developed areas (e.g. Northstar, Squaw Valley, etc.), but it is not appropriate for Homewood, as Homewood is clearly not “similar to other surrounding ski resorts.” Homewood’s distinct and unique character is obvious; This statement only reiterates the need for a Community Plan process *first* to capture that distinct and unique character in a CP. ]

[ Proposed Findings Regarding Community Objectives and Desires in the Absence of the Community Plan Process Violates TRPA’s Goals and Policies<sup>3</sup> and is not analyzed in the DEIR

11 TRPA’s Goals and Policies envision that increased development should occur through the adoption of Community Plans, and substantially restrict TRPA’s right to increase development allocations in the absence of such Plans. TRPA’s Goals and Policies demonstrate that development allocations should flow from the adoption of Community or Master Plans to ensure that such allocations are consistent with the larger picture community plan. For example, TRPA Goal and Policy, Land Use Element, Goal No. 2 requires TRPA to “***Direct the amount and location of new land uses in conformance with the environmental threshold carrying Capacities and the other goals of the Tahoe regional Planning Compact.***” This section states that, “*evidence included in the environmental impact statement prepared for this Plan, and public testimony, the Tahoe Region is experiencing resource use problems and deficient environmental controls.*” To ensure attainment of this goal, Policy No. 2 states:

“All plan area statements, community plans, or other specific Plans adopted by the agency shall specify the total additional Development which may be permitted within the region, not to Exceed the limitations set forth in a, b, c, d, and e, below.”

This section allows additional commercial development as follows:

“The amount of additional commercial development is based on the estimated needs of the region. Commercial development may be permitted *as specified in plan area statements, community plans, or other specific plans.* The total

<sup>3</sup> Here we reiterate concerns raised in our 11/23/07 Letter to TRPA.

additional gross commercial floor area permitted shall not exceed 800,000 sq. ft., excluding minor expansion, for the first 20 years of this plan. (emphasis added.)”

See Goals & Policies, p. II-6. Similarly, TAUs are limited to additional units “as specified within a community plan and as provided for in Goal #3, of the Development and Implementation Priorities Subelement.” In addition, the TRPA Goals and Policies (p. II-6.) suggest that additional commercial development must occur within the parameters of approved community plans:

“Community plans shall guide development in specified areas for at least the first ten years of the plan and shall be kept current by periodic review. The TRPA shall actively encourage prompt development of community plans for all designated areas, with a goal of completing the community plans by December 1, 1989. The areas designated shall be those where commercial use is concentrated or should be concentrated. They shall be areas served, or easily served, by transit systems, which have adequate highway access, which have, or can have, housing in the vicinity available for employees working in the area, and which otherwise qualify as areas suitable for continued or increased levels of commercial activity. Some areas, because of their existing and proposed development patterns, may incorporate more than commercial use classifications.”

The goals and policies also conclude that additional commercial allocations should be made according to the “best” Community Plans that have been approved:

“As soon as TRPA has reviewed a sufficient number of proposed community plans, to adequately assess the cumulative impacts of development and proposed mitigation, TRPA shall distribute the remainder of the 25 percent of the additional commercial floor area. This distribution shall reward those [CPs] which best demonstrate the ability to achieve and maintain environmental thresholds, and have a clearly demonstrated need for the additional allocation.”

See p. II-9. In addition, the Goals state:

*“The amount of additional commercial floor area allowed outside community plans shall be no more than 40,000 square feet for the first ten years of the Regional Plan and shall be allocated to individual projects by TRPA.* TRPA may, by ordinance, allow reassignment of this commercial floor area to community plan areas in conjunction with adoption or amendment of community plans. The amount of commercial development outside [CPs] shall be checked at two-year intervals to determine if the rate at which projects are being approved exceeds the projected 4,000 square feet a year rate by more than 25 percent.”

See p. VII-7. The Project proposes a higher level of development outside an approved Community Plan, contrary to the TRPA Goals and Policies. TRPA appears to justify this through inclusion of the proposed project in the CEP program, which requires a net environmental gain above and beyond that required by the Regional Plan. Multiple problems exist with this concept, including but not limited to the concern that inclusion in

the CEP program does not negate the requirement for a Community Plan to be adopted before a CEP project is allowed to forever change an existing community.

Nowhere in the history of the TRPA is there any prior indication that Homewood is an area where commercial use should be concentrated, and it is specifically not mentioned in the two PAS areas 157 and 159 clearly not in the non-existent CP. ]

[ **III. The DEIS Fails to Disclose the Guaranteed Water Supply To Be Demanded by the use of the Project Housing, Facilities, and Operation of Current and Future SnowMaking and the Final Sources of to Meet Current and Future Water Demands.**

12 We are extremely concerned with regards to the increased demand for water that will be generated by this project, given that there is a finite amount of water available in the Basin, established by the TROA Settlement and that to date, although there are senior water rights holders, it is unknown how much of that water is, at this point, paper water – in that it exists on paper, but not in fact. While the data in the Water Supply Assessment Appendix is more complete than the DEIS, there continues to be no clear understanding of what TCPUD has actually funded of their future Homewood-area water systems, and what of those systems are subject to future local and state funding sources. There is no link between construction of the project and a guaranteed delivery of future water in the to-be-upgraded systems. Further, there is the ominous issue of a likelihood that the current snowmaking allocation from TROA – 600 acre feet of water - - may exceed the total amount of water available. In that case, as a junior right, snowmaking would be curtailed as detailed below by California Department of Water Resources:

“The DWR submitted a letter dated April 3, 2009 on the Project Notice of Preparation (NOP). The letter recommends that Placer County review the terms of the TROA for applicability in connection with the Project. Discussions with TRPA and State Board staff and John P Headless, P.E. with DWR determine that there is a situation where snowmaking interests could find themselves pushed up through the interstate allocation of 23,000 acre-feet/year in the Tahoe Basin by holders of senior water rights. Notably if there are water rights that are only partially exercised and therefore not known to DWR, that are senior to those obtained by the snowmakers and if those rights were to be fully exercised at some later date, then the snowmaking use which appears to be at or above the first 600acre-feet/year could be diminished because of their junior status. Given the state of knowledge about the number and quantity of under used water rights in the Lake Tahoe Basin, there is no assurance that increases in snowmaking might not at some point cause an exceedence of the Tahoe Basin allocation for California”. (communications with John T Headlee, P.E., November 23, 2009). (HMR DEIS, p 15-116, Jan 20, 2011).

“Based on the information provided in the HMR Water Supply Assessment (Nichols 2010) and the Snowmaking Planning document (Snowmakers 2009) and the HMR Master Plan

(JMR 2010) the impacts of expanding snowmaking operations on domestic water supplies of TCPUD and MCWC service districts are unclear. [Emphasis added]. Given the uncertainty associated with the snowmaking demand with the forthcoming diversion allocations for the TROA, the impact is potentially significant based on the evaluation criteria for HYDRO 5.” (p. 15-116-7 HMR DEIS,, Jan 20, 2011)

The TASC notes that it provided approximately seven pages of NOP comments on Water Supply, and indicated its extreme concern to the Project proponent. The Initial Study stated that:

“The EIR will discuss the source of water, the quantity of water available and the potential water sources to be utilized for all aspects of the project, including snowmaking. The EIR will address the Tahoe City PUD and Madden Creek Water Company’s ability to serve this project for potable water service.”

TASC notes that the promise of this statement has not been met. There is no definitive statement by the district that the Tahoe City PUD and Madden Creek Water Company have the ability to serve this project with additional potable water service. In fact, there is a further discussion in the DEIS that hints that there are ways to work around the potable/non-potable issues. But there is no clear disclosure in the DEIS of this dilemma.

**A. Truckee River Operating Agreement (TROA)**

TASC, in our substantive NOP comments, cited the regulations of the TROA and provided the link at <http://www.focuswest.org/law/pl101-618II.cfm>) including exact replication of the applicable language. In addition, we provided data from the California SWRCB website as to licensed, permitted and pending applications. TCPUD currently has

***California TROA Appropriations:***

According to data from the California State Water Board’s website<sup>4</sup>, existing water appropriations from Lake Tahoe total 37,237 acre-feet/year and cited the details in a SWRCB table, taken from a search done on the website for all appropriations from Lake Tahoe as the Water Source<sup>5</sup>. TCPUD has 5,774.5 acre feet of water in a pending application. And Quail Lake Water Company, which is not mentioned in the Water Supply appendix, has a pending application for 288 acre feet of water.

**B. The DEIS Fails to Disclose that Monitoring Is Not A Mitigation Measure For Water Supply Deficits, Cumulative Water Supply Impact or Water Demand On Total Water Availability.**

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<sup>4</sup> <http://ciwqs.waterboards.ca.gov/ewrims/ewrims/EWMenuPublic.jsp> (Select “Water Right Search”; then: Water Right Type: “Appropriative” and Source (River Name or Source Name): “Lake Tahoe”)

<sup>5</sup> Several columns irrelevant to expressing the total numerical appropriations were removed for formatting reasons (e.g. permit and application numbers, etc.)

The problem for HMR is that, taken alone or in combination with other existing uses, anticipated additional major redevelopment projects, and increased demands from other expansions, the basis for a Cumulative Impact Analysis in the basin may show that the basin is so over-subscribed as to have NO extra water. It is folly to propose new projects that will demand substantially more water when there is no guarantee that additional water will be available. The result of this action is quite likely to result in the case that some owner down the line may end up holding the bag, as it were, and a dry bag with no water at that.

The DEIS acknowledges the water supply problem, calculates HMR's ultimate demand, but proposes mitigation measures that do little to address that additional demand. The mitigation measures that allegedly will reduce the scope of the problem to allegedly less than significant are two; to perform monitoring on use, to determine the actual use and to perhaps limit water uses to the maximum permitted. The second mitigation is to pay connection fees to TCPUD and MCWC that will ensure sufficient water to meet peak demand (p. 15-114 HMR DEIS, Jan 20, 2011) The fees will help TCPUD and MCWC, but it is only a small part of the funding pie.

As to the first mitigation measure – monitoring – there is no explanation or contractually guaranteed action that is proposed, if the monitoring proves that the use exceeds the amount allocated. This alleged mitigation measure does not solve the problem of water supply not meeting demand. Monitoring does not qualify as a recognized mitigation measure. Monitoring merely tells you what is happening, not what to do to resolve impacts to the environment. A project can monitor the mitigation measure for compliance. That is not the same as monitoring as a mitigation measure.

The DEIS fails to offer mitigation that is designed to reduce demand to the amounts of water actually available. There may be many options to increase water supply, none of which is considered in the mitigation measure for monitoring because monitoring takes no action on its own. The fallacy of the measure is that monitoring is just that – information gathering, - and is decidedly not directed policy nor action.

#### C. The DEIS Fails to Provide the Detail Necessary to Determine Total Available Water.

The second mitigation measure is equally troubling. The mitigation measure is proposed as “The payment of connection and service fees approved by TCPUD and MCWC will ensure sufficient water to meet peak demand in the Project [Alternative I ]) area.” The DEIS fails to explain how paying into a system that has not been funded and is not under construction and may not be until public funds are available is a solution. It can be a hoped-for solution, but it certainly is not a guaranteed solution for the day when demand is greater than the actual supply. The fact that there is a plan that will cost \$24 million is not a guarantee that the public monies will actually be raised, especially given the state of the state's finances this year and for the foreseeable future.

The DEIS does offer the carrot that “Preparation of a final WSA to identify the quantity and source of potable and non-potable water to serve the Project must demonstrate that

water source(s) are adequate and meet State and Federal requirements for quality and quantity.” DEIR/DEIS p.15-119. The DEIS fails to disclose that the promised WSA must be prepared and subject to public comment, endorsement by TCPUD and MCWC prior to the TRPA Governing Board approval. There is no point in presenting a project to the Governing Board for approval that has not yet provided the detail that is needed to assure that water for the project will not reduce current supplies to existing users, that the water demand for the project is factually available, and that water for build-out of the project is proven to be available by California’s Department of Water Resources.

The DEIS fails to provide the necessary detail regarding water supply demands as described in the DEIS. In fact, the DEIS says that it will prepare “a final WSA to identify the quantity and source of potable and non-potable water to serve the Project” and that the “final WSA must demonstrate that water source(s) are adequate and meet state and Federal requirements for quality and quantity.” DEIR/DEIS p. 15-119.

The DEIS fails to propose an adequate solution to the lack of adequate water supply to reduce the impacts on the available water supply. Further, the DEIS assumes that Alternative 1 of the Project can be built, based on the less-than-functional mitigation measures, and that solutions can be found afterwards. ]

[ D. The DEIS Fails To Disclose Potential Problems With Future Water Supply Based On Predictions Of A Significant Change In The Tahoe Climate.

Further information that was not available at the time of TASC’s NOP comments should be noted. The calculations to ascertain the amount of water used in a snow-making operation and the amount of water that would return to the system from the melting snow was based on evaporation rates in Colorado. As Colorado is not a Mediterranean climate, it is clear that the evaporation rates used to calculate the first 600 acre feet for snow-making, and the excess snow-making return of 16% is less than that experienced in the Tahoe Basin with its dry climate.

13 In the light of the potential impacts from Climate Change and the ability to further monitor actual melt from the made snow, it behooves the various water agencies in the basin to re-construct the actual impacts of the numbers currently ensconced in the TROA for snow-making.

The DEIS fails to examine the actual on-the ground results of melt-off and the actual return to the tributaries of the lake and the lake itself.

When addressing such a highly prized commodity such as future water availability it is important for the FEIS to disclose all the factors that determine the final amount of available potable and non-potable water, the impacts on current water users, the likely impacts on current water users in a worst-case scenario

IV. The DEIR/DEIS Fails to Fully Assess Climate Change and Impacts on Water Supply:

Assessing the project's impacts on water demand relative to the *existing* water supply is no longer sufficient in itself due to the impacts of climate change, which are expected to reduce water supply as well as affect when precipitation falls, which will impact water storage systems (including reservoirs, e.g. Lake Tahoe's top 6 feet). The impacts of the proposed Project on *demand* for water are two-fold:

- (1) The increased demand for water associated with the increased population created by the project (e.g. residents and visitors)
- (2) The expected need to increase snow-making efforts as climate change affects precipitation amounts and types (e.g. more rain, less snow).

As discussed above, the Tahoe City PUD is already using most of its ground-water capacity and has stated that it may need to find additional water sources if demand increases. However, if the amount of water in Lake Tahoe *decreases*, there will be less water available than exists today. We can no longer afford to ignore this "inconvenient truth." We simply can not increase demand for water in the Lake Tahoe Basin.

In fact, the "Tahoe State of the Lake Report 2008" from the Tahoe Environmental Research Center (TERC) summarizes their findings with regards to impacts on water supply, temperature and precipitation caused by global warming:

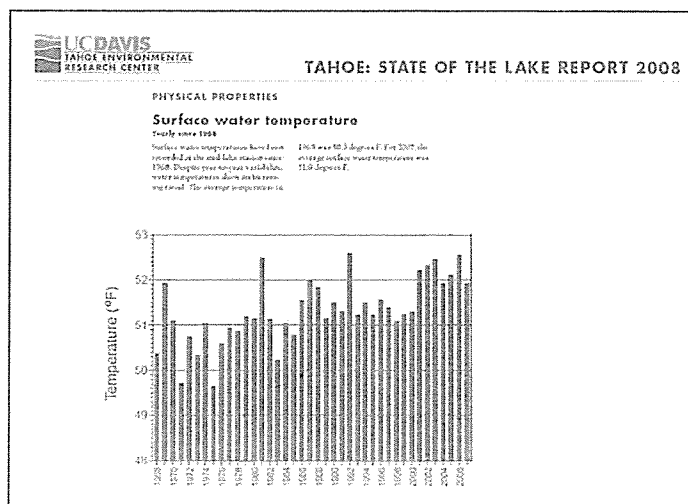
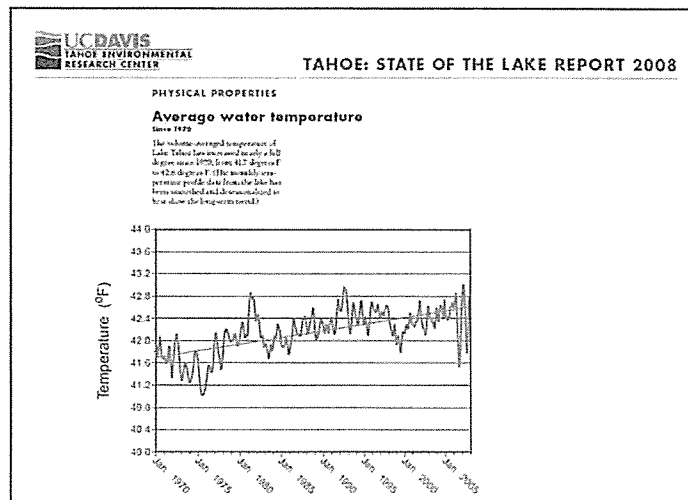
### Meteorology

The Lake Tahoe ecosystem is largely driven by meteorology. In the short term, meteorological conditions are expressed as daily variations in weather. In the long term, they are expressed as normal cyclical variations such as wet and dry cycles, and long-term trends related to global climate change.

Historical record:

- The nightly minimum temperatures recorded at Tahoe City have increased by more than 4 degrees F. since 1910. (Fig. 7.1)
- Days when air temperatures averaged below freezing have decreased by 30 days per year since 1910. (Fig. 7.2)
- Since 1910, the percent of precipitation that fell as snow decreased from 52 percent to 34 percent. (Fig. 7.7)
- Peak snow melt averages 2 ½ weeks earlier than in the early 1960s. (Fig. 7.8)

Previous year's:





- 2007 was the 14th driest year on record. Precipitation at Tahoe City was 19.7 inches, two-thirds of the annual average of 31.6 inches. (Fig. 7.5)
- Every month in 2007, except February and September, was drier than the 97-year average. (Fig. 7.6)
- Snow represented 37.6 percent of total precipitation at lake level. (Fig. 7.7)

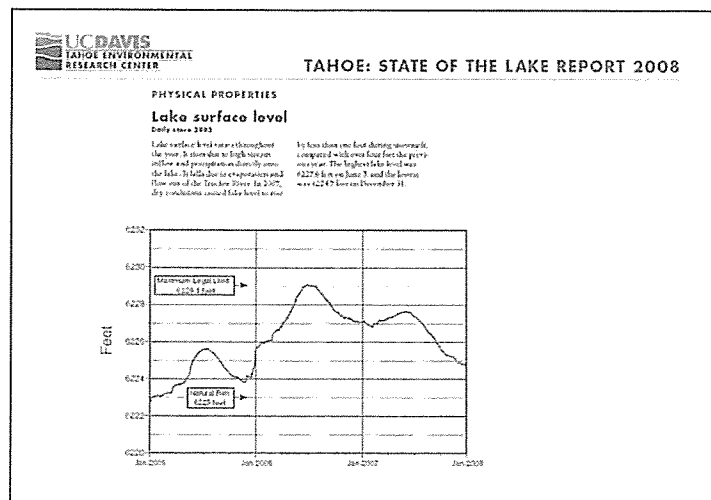
Basically, the findings show that nighttime and daytime temperatures are increasing, that more precipitation is falling as rain than snow and that snow melt averages are occurring earlier in the year. All of these findings suggest that ski resorts will need to make more snow (assuming temperatures allow) if they are to support skiing at the same level of use as today. Clearly snow-making can only be done during those periods when temperatures are below freezing (although TERC's data show there will be fewer opportunities for snow-making in the future, thus long-term investment in the ski industry is questionable). It is reasonably foreseeable that Homewood Mountain Resort would expect to increase snow-making in the future, thus increasing the demand for water. While we understand and appreciate that the owner is looking at ways to re-use runoff for snow-making back up on the mountain, we can not assume success until the concept is proven to be successful.

Additionally, the data show that we have less annual precipitation, a trend which may fluctuate up and down over time, but overall may continue in the long run, thus decreasing the Basin's overall water supply. It simply makes no sense to approve projects which will significantly increase the demand for water when data tell us that we may soon have less water.

The report also discusses the lake's surface level and how it has changed in recent years – another factor which affects the amount of water taken from Lake Tahoe.

### Lake surface level Daily since 2005 Physical Properties

Lake surface level varies throughout the year. It rises due to high stream inflow and precipitation directly onto the lake. It falls due to evaporation and flow out of the Truckee River. In 2007, dry conditions caused lake level to rise by less than one foot during snowmelt, compared with over four feet the previous year. The highest lake level was 6227.6 feet on June 3, and the lowest was 6224.7 feet on December 31.



[http://terc.ucdavis.edu/stateofthelake/StateOfTheLake2008\\_Chapter8.pdf](http://terc.ucdavis.edu/stateofthelake/StateOfTheLake2008_Chapter8.pdf)

Of note here is the obviously downward trend we are currently experiencing. Further, as explained in the above text, dry winters can result in minimal lake levels. Yet water demand from increased populations in the Basin will not linearly follow precipitation levels. Therefore, the demand for water may remain fairly consistent while the supply of water can drop significantly. Based on TROA (legally) and environmental factors (environmentally), we can not plan to simply draw more water from Lake Tahoe during those drier years.

The EIS must:

- Fully analyze climate change and associated impacts on water supply, delivery and all related matters.
- Analyze how water demand will be met for the project in light of less water in the future (we recommend a 25% reduction be used in this assessment, per possible scenarios discussed in past discussions during climate change presentations).
- Analyze the impacts of established climate change trends on snow supply.
- Analyze the impacts of climate change on snow making needs, and how this will affect water demand (assuming, until otherwise proven successful, that water for snow-making is based on existing technology).

**V. Economic Impacts and Climate Change (including impacts on ongoing mitigation):**

14 While a project owner's ongoing costs and profits are perhaps not usually comprehensively discussed with regards to the environmental analysis, for this project, the situation is unique. As a hydrologist recently stated after reviewing 10 years worth of water quality data, "I don't recommend anyone invest in the ski industry." Basically, the impacts of climate change are going to disappoint skiers and snowboarders. As the TERC report shows, now just 34% of annual precipitation in the Basin falls as snow; whereas in the early 1900's, that number was 52%. Recent data indicate more rain on snow events, and trends, which are expected to undoubtedly continue, will mean only more rain and less snow. Additionally, as night time temperatures are below freezing less often, opportunities for making snow will be fewer. And finally, as we've recently experienced, winters will be shorter, thus ski seasons will be shorter.

In fact, as the 11/25/05 article below<sup>6</sup> summarizes, "Sierra ski resorts may be first to feel economic heat of global warming" (so titled). The article begins:

"A report predicting global warming's effects on California's economy could have dire implications for Tahoe's ski industry.

Under a business-as-usual scenario, snowpack could decline by 90 percent by the end of the century, said Michael Hanemann, a professor of economics at UC Berkeley.

Even under the best scenario, where greenhouse gas emissions stop today, Sierra

<sup>6</sup> <http://www.tahodailytribune.com/article/20051125/NEWS/111250040>

snowpack could still shrink 36 percent over the next 50 years, according to Autumn Bernstein with the conservation group Sierra Nevada Alliance.

Hanemann is one of several scientists who helped produce the report, which will come out Dec. 5 as a step to comply with Gov. Schwarzenegger's executive order this summer to reduce greenhouse gas emissions and create a Climate Action Team.

#### Melting glaciers

It's been reported that glaciers at several European ski resorts are already melting. If the Climate Action Team's predictions are true, America's ski resorts, the scientists suggest, may soon become the poster child for global warming's impacts on the economy.

A smaller snowpack and earlier spring melt would shorten the ski season three to six weeks by 2050, Hanemann wrote, noting a similar report released in 2004. By the end of the century, another four to nine weeks would be chopped off.

And, under a worst-case scenario, "skiing with natural snow in the Sierra would vanish except possibly at the very highest elevations," according to last year's report.

More information on the report is available at [www.climatechange.ca.gov/...](http://www.climatechange.ca.gov/...)

In sum, we can expect that in the future, there will be fewer skiers and boarders spending money to ski/board (and to stay overnight) in the Basin. Thus, those mitigations and ongoing operations which are necessary to mitigate the impacts of this development make the economic discussion vital because once the project is constructed, it can not be unbuilt. However, if money runs out for the Resort, the Resort may not be able to fund the ongoing mitigations needed to mitigate impacts of the development

It is reasonably foreseeable that in the future, ski resort profits will decrease as snow fall and ski seasons decrease. The EIS should therefore analyze:

- A list of all mitigation measures which will require ongoing funding from the owner;
- A list of all mitigation measures which will require ongoing use by a certain number of people to be economical;
- A smaller scale project which, because less is built, requires less mitigation to mitigate impacts. Within this smaller scale alternative, the EIS should also list the mitigation measures that will require ongoing funding by the owner. ]

#### [ VI. Transportation:

15 One of our greatest concerns with the proposed project is the transportation related impacts of bringing an additional 1,000- 1,400 people to the Homewood area. When we first spoke with the owner regarding the project, we were told that two of the ways the project would reduce traffic impacts would be:

- (1) to reduce the traffic from day skiers coming from out of the Basin based on the assumption they would stay overnight at the resort instead; and
- (2) to reduce peak traffic, based on the assumption that skiers would instead come to and/or leave HMR during non-peak times and stay longer (e.g. more overnight stays during the week and less skier traffic on weekends).

So we could better understand the demand that would dictate both of the above assumptions, we asked the owner to provide demographic data that would show the demand for these accommodations. Specifically, in a letter dated 1/23/08, we asked:

**“Demographic Data:**

We would like to see the existing usage data e.g.:

- Annual, weekly, daily/weekend day and Holiday average users
- Where users are from (more specific than in vs. out of Basin, i.e. “Bay Area, So. Cal, Sac Valley, San Joaquin Valley, No. Sac Valley” and “Kings Beach, Tahoe Vista, Tahoe City, Homewood, So. Shore, etc.”)
- Number/% of day users versus overnight stays (for each location and time of year/average day of week, etc.);
- Number/% of non-local DAY users
  - o Of this Group, what days of week/Holidays do they come (perhaps show as % M-F, % Sat, % Sun, % Sun-Sun, % 3-day weekends, etc.);
- Number/% of non-local Overnight users
  - o Of this group, #/% who own 2<sup>nd</sup> homes in the Basin
  - o Of this group, #/% who stay in hotels vs. rent vacation homes
  - o Of this group, length of stay and when (e.g. do most non-local overnight users come up just for the weekend? What % come during the week? Etc.).
  - o Of this group, which west shore area they stay at (e.g. Homewood, Tahoma, Sunnyside, Tahoe City, or N. or Tahoe City, Truckee, etc.).

[ What other demographic data are available? For example, what are the ages, incomes and job status of non-local users? This will affect their expenditures (age & income) and days/times when they could stay overnight (job status working M-F vs. retired), etc.

**Surveys:**

- Have there been surveys to assess demand/desire for overnight accommodations at Homewood by existing non-local users? (The project indicates there will not be additional non-local users but rather a shift of *existing* non-local users from peak weekend travel times to a more spread out/off peak time, so we are looking for all information available to help us better understand this demand and therefore how the proposal accommodates it).”

**Peak Traffic:**

Basically, it surprised us that there would be such a demand for non-weekend accommodations from skiers and boarders; many people who come to the Basin from outside areas to ski/board have full time jobs and/or are students, and thus work Monday-

Friday. This is obvious to anyone who experiences the traffic impacts on a Friday night and Sunday afternoon during the winter months. Additionally, HMR already documented this trend in their 2/14/08 response: “[The] majority of skier visits occur on weekends and on the following holiday periods: Christmas-New Year, Martin Luther King weekend, President’s Day weekend, Ski/Skate scholastic break in February which is typically the same week as President’s Day weekend, and Spring Break (March and early April dependent on school district).”

Therefore, for the project to result in a significantly sized group of users such that peak traffic would be significantly alleviated by the project (and to do so given the additional population it brings to Homewood), there would have to be a substantial number of skiers/boarders that are interested and able to come to Homewood during non-weekend and non-Holiday periods and stay overnight at the resort. Additionally, earlier discusses indicated an interest in targeting existing customers of the resort. HMR stated that the “Primary target markets (non-local) are the San Francisco Bay Area, the metro Sacramento area, and Reno.” Therefore, we asked how many non-local customers have 2<sup>nd</sup> homes in the Basin, since clearly this group already has local accommodations.

We appreciate that HMR was quickly responsive to our requests and provided as much information as they could, however, the data that we needed to best understand this assumed demand for off-peak accommodations was not available. This has been mentioned in recent presentations by HMR, This is a nice idea but remains unsupported by any evidence. Further, other Basin locations providing overnight accommodations still experience peak usage on the weekends (e.g. Heavenly Valley Resort & Stateline area, which provides ample overnight accommodations).

Thus, what we see proposed is a project that will bring an additional ~1,000 to 1,400 or more people to Homewood with the likelihood that most of that increase will add to peak time densities, both in Homewood and on the roadways in and out of Homewood.

For consideration, we separate impacts to traffic into two categories:

- (1) Additional traffic/VMT from HMR customers coming to and from the Basin; and
- (2) Vehicle impacts from HMR guests during their stay. □

18 [ (1) Examining traffic coming to and from Homewood:

We appreciate HMR’s discussion and commitment to an alternative transportation plan [ATP] (NOP p 8-9). It is clear that HMR wants to support a better transit system, and has put far more thought into transportation than other large projects that are at this stage, and we applaud those efforts. However, the existing ATP is generally aimed at reducing vehicle use among guests once they have arrived at HMR, and thus, does not mitigate the impacts from guests driving to and from HMR from outside of the Basin (driving is the only means to get to Homewood). Therefore, we first examine what those impacts may look like:

If we use the rough average of 'skiers per car' counted during the 05/06 winter season (previously provided by HMR) – approximately 2.4 / vehicle - to assess the number of vehicles associated with 1,200 people, this translates to 500 additional vehicles in the Basin (because those staying at HMR might invite guests of their own, this number may underestimate the number of vehicles). For our purposes here, that means 500 more vehicles are driving to and from Homewood from out of the Basin (after all, we assume those who live in the Basin will not stay overnight at Homewood). Most will come via Truckee and State Route (SR) 89. Below, we examine possible increased VMT specifically in the Basin as a result of the project:

*If we assume 100% come through Tahoe City via SR 89:*

Homewood to Tahoe City is 7 miles and we estimate Tahoe City to the edge of the Tahoe Basin Watershed is around 3 miles, totaling 10 miles one way.

Therefore, each of the 500 vehicles will add 20 VMT (round trip) simply coming to and from HMR. This would translate to a total of 1,000 VMT added to the Basin per visit by those 1,200 overnight guests. That is 1,000 miles of re-suspended particulate that can enter Lake Tahoe, of tailpipe emissions that can create unhealthy air for us to breathe and damage our already stressed pine forests, and noise that disrupts our enjoyment and wildlife (we note that TRPA's threshold evaluations show vehicle noise is a primary factor contributing to non-attainment of noise threshold standards).

However, some visitors may come via SR 89 S through Emerald Bay. Those visitors will add perhaps 60 VMT / trip. Visitors coming over Highway 267 may add 40 VMT/ trip.

These estimates do not consider the additional VMT caused outside of the Basin. Although TRPA is not legally responsible for evaluating this, Placer County should not allow more VMT on already crowded roads and highways (especially during peak use) for air quality, water quality and climate change reasons.

Further, these estimates are based on one "round" of new guests, when actually, guests will be coming and going all year round, multiplying the impacts from that 1,000 VMT by orders of magnitude. ]

(2) Examining Traffic once visitors are at Homewood:

As mentioned, we recognize the extensive thought and effort HMR has put towards developing the ATP to serve guests once they are at HMR. These include numerous transportation related services, including bike trails/extensions, employee shuttle buses, employee public buses bus-fairs, scheduled shuttle service, north-south base shuttles, electric/hybrid car rental, bicycle shares, Dial-a-Ride, and so on. This list is impressive. However, the question is whether these services can completely 'neutralize' the impacts of the additional guests on traffic, or rather, since CEP

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projects must show net gain, whether these services can actually *reduce* traffic/VMT from existing levels.

- The EIS must analyze the specifics of these services, including hours of use, number of trips, ridership, etc.
- The EIS should analyze various levels of ridership/use of these services, including an assessment based on low ridership and then varying degrees of ridership, up to that expected from the project.
- Expected ridership must be based on sound quantitative/survey data, which must be included in the EIS.<sup>7</sup>
- The EIS should use data from other Basin areas wherever available to assess expected use and trends. Where data are not available locally, the source of data used, including all associated assumptions and other inputs (and uncertainties), must be included in the EIS.
- The EIS should explain the funding source for various services to show what services (or portion thereof) will be funded by HMR versus other public or private entities and thus operate regardless of funding from HMR. This will allow for the determination of which mitigation measures rely on ongoing funding from HMR (to address questions posed under the Climate Change section). This will also inform the public of which services are covered by tax dollars.
- The transportation analysis should also include a survey, performed by survey experts with a sufficient number of participants to be statistically valid, assessing how many guests at other similar facilities in the Basin drive to locations during their stay (i.e. many visitors take a scenic drive around the lake). We appreciate HMR's desire to connect to other Regional services, including (hoped for) future waterborne transit to other Basin areas, but until such services are established, we must assume that visitors will drive to some locations (especially driving a circle around the Lake) regardless of services offered in the Homewood/west shore vicinity.

In sum, the EIS must clearly provide all of the evidence necessary for the public to perform the same technical analysis and receive the same results as those in the EIS.

This section really needs an update or make it more general & smaller. ]

[ Parking:

The DEIR/EIS states that the proposed project (Alternative 1) will include a total demand of 1,054 parking spaces with a supply of 910 provided.

20 Total Parking:

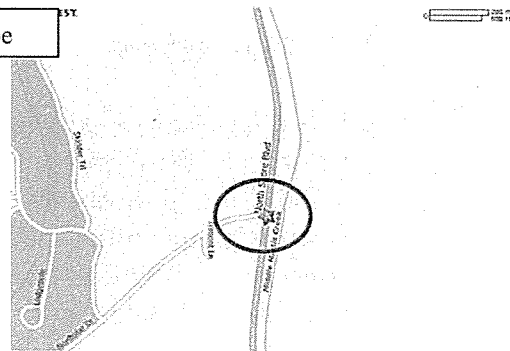
First, the total proposed parking is less than the existing parking space of 942 plus 280 on-street parking spaces. Thus reiterating our concerns expressed in the transportation

section that this project will add more vehicles to the transportation network in the Homewood area and along ingress/egress routes for the Basin.

According to the parking counts provided by HMR, there may be over 400 ski visitor vehicles on peak days. Therefore, there will be fewer parking spaces than peak period demand. HMR has stated that their transportation planning will reduce vehicle use by day users through a variety of means, including providing transit services, dial-a-ride, shuttles, etc., and placing a sign at the Tahoe City Y to advise people that HMR is “full”. HMR is relying heavily on these mitigations to substantially reduce day skier impacts, therefore we are very concerned with the ability of these other ‘mitigations’ to reduce day skier vehicle use by over 400 vehicles.

- The DEIR/EIS does not provide sufficient quantitative analyses showing the mitigation measures that will reduce vehicle use by day users so that parking capacity is not exceeded. Inputs and assumptions to this analysis must be included in the EIS.
- The DEIR/EIS does not sufficiently explain how any signage will work. For example, if an electric sign will be placed by the Tahoe City Y to inform skiers/boarders that HMR is “full”, this will only capture those skiers coming through Tahoe City. There are 7 miles of communities between the Tahoe City Y and Homewood. It does not appear that people will be informed not to continue driving to HMR. We understand some public education will be involved. The same issues apply to signage for those people.
  - HMR refers to the sign used for Northstar at Tahoe as a successful example (below) but the situations are not comparable, because all skiers driving to Northstar come through the main entrance off of highway 267 (above right), therefore there is no group of skiers that would miss the sign as they travel to the resort (unlike those living between Tahoe City and Homewood [below right]).

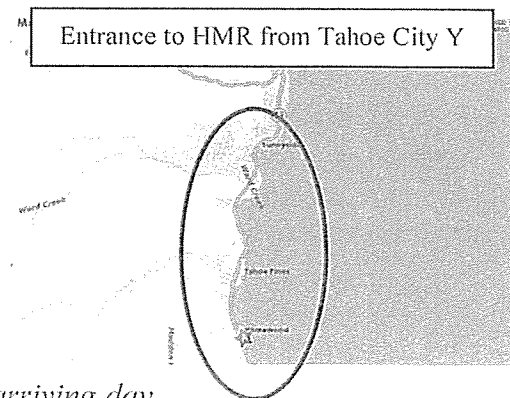
Entrance to Northstar-At-Tahoe



**“Response: SIGN AT TAHOE CITY “Y”:**

*JMA Ventures commits to providing real-time signage near the Tahoe City “Y” on busy ski days to provide skiers with information regarding the availability of parking (and supporting shuttle services) at intercept parking areas. This sign will be either staffed or operated electronically to change messages as needed to provide timely information n to arriving day*

Entrance to HMR from Tahoe City Y





*skiers. A good example of the benefits of this strategy is the trailer-mounted sign used by Northstar-At-Tahoe to divert day skiers approaching Northstar in periods when there is no remaining day skier parking available at the resort.” (p43-44, APC Staff Summary)*

- As touched on above, there is clearly ‘lag time’ between when someone leaves their home (assuming there is education advising day skiers to call ahead for status) or passes the sign at the Tahoe City Y and when they get to HMR. During that lag time, the parking lot may fill up. However, those users may still end up driving several miles and entering Homewood, thus creating traffic impacts. Impacts would also be caused by vehicles having to turn around and go back home. The DEIR/DEIS fails to discuss how the lag time situation will be addressed.]

21 [ North Base – Summer Use:

HMR has discussed the use of the parking lot in the summer by vehicles with boat trailers using the boat launch across the street. Due to the emissions (air, water and noise) caused by motorboats, any increase in motorboat use caused by this project must be considered in the final environmental analysis. Traffic impacts from additional vehicles associated with the boat parking must also be considered.]

22 [ Roadway network:

It is a fact that no new neighborhood roads or highways are allowed in the Lake Tahoe Basin. On West Shore, there is one 2-lane highway running from South Lake Tahoe to Tahoe City: highway 89. During peak periods (winter weekends and Holidays, summer weekends, and often midweek during July and August), SR 89 experiences significant congestion. Vehicles may be stopped for miles on S SR 89, trying to exit the Basin through the Tahoe City Y on a Sunday afternoon. There are no “back roads” that can be used as alternative routes. In addition to the environmental implications (e.g. idling vehicles emit more pollution), this raises serious problems for emergency vehicles that need to get to these west shore communities quickly. There is often no shoulder for an ambulance or fire truck to use. When cars are lined up for 2 miles with nowhere to go, those emergency vehicles are stuck trying to meander through oncoming traffic, which no doubt seriously delays the time it takes for them to reach their destination. The time lost may be enough for someone to die or become seriously ill while waiting for medical attention, or for a fire to get out of control. Adding more traffic to this area, especially during peak periods, is simply irresponsible and should be prohibited. It is not good enough to hope that mitigation will work, even with the best intentions, because there has yet to be a project in the Basin which proves there is mitigation that truly mitigates 100% of the impacts to the transportation network (and as mentioned, this project does not address the vehicle impacts of guests coming to and from HMR, where the greatest

impact to this peak congestion is expected). Trying to find new mitigations that could meet this objective should not be done in an area that is already so congested with no room for error.]

[ Construction traffic and total material removed:

23 “Trucks removing excavation material... will generate up to approximately 146-192 trips per day.” DEIR/DEIS p. 11-81. According to the 2008 site plans available the total material to be removed from this project area is 81,000 dump truck loads. The soil conservation threshold is significantly impacted by removing such a substantial amount of material.]

[ VII. Emergency evacuations:

*Wildfire:*

The transportation discussion segues into our next concern: emergency evacuations. If a fire were to break out along West Shore, which recent Basin fires have proven is clearly a real threat, people only have the 2-lane SR 89 as an evacuation route. If visitor traffic alone stops traffic miles south of Tahoe City, what will happen when full communities must evacuate? Under existing conditions, the situation is already dangerous. The project could add hundreds of new vehicles to that already clogged roadway, and put ~1,000 or more people into a dangerous situation. We should be first assessing how we will protect existing communities in the event of a fire before we consider adding more people to the area.

- 24
- The FEIR/EIS must include the plans for how existing communities would be evacuated in the event a wildfire breaks out.
  - The FEIR/EIS must then assess how this will occur with 1,000 to 2,000 more people.
  - We understand HMR is considering waterborne transit options for evacuation in the event of a wildfire. The FEIR/FEIS must include a description of this plan and evidence supporting its application for this purpose (and the ability to provide ongoing funding regardless of HMR profit or loss). Additionally, other considerations must be included. For example, there is a concern regarding the safety of waterborne transit as an emergency exit during high winds. This is especially important since the days a wildfire is more likely to grow uncontrollably (and most threaten communities) are days where weather conditions create severe fire weather – which generally includes windy conditions. If waterborne transit cannot operate on even the most extreme weather day, it should not be considered a viable option for evacuations from wildfire.]

- [ • Also, the FEIR/S should disclose evacuation methods for winter use as well (more discussion of winter dangers is below).

*Avalanches, Landslides, etc.:*

Additionally, concerns occurring primarily in the winter (and perhaps spring) include landslides, rock falls and avalanches. The Initial Study states:

“According to the Geologic Hazards and Preliminary Geotechnical Evaluation by Kleinfelder, dated November 1, 2007, this site is located in a region traditionally characterized by moderate seismic activity. A major seismic event on faults in the vicinity may cause moderate shaking at the site. The site is located within Seismic Zone 3 of the California Building Code. If structures are constructed according to the current edition of the California Building Code, the likelihood of severe damage due to ground shaking should be minimal. Apparent avalanche run-out chutes were observed on the west side of Lake Louise in the Kleinfelder Report.

These features are not located on the subject site, but a potential exists for avalanches to occur in the subject site. Multiple areas of rock outcrop, steep slopes and soil creep were observed on the subject site. A potential for seismically-induced rock fall exists. An abandoned mine (Noonchester) and two mine shafts are located just off-site to the south of Quail Lake.

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The EIR for this project will include an analysis of the impacts associated with exposure of people or property to geologic and geomorphological hazards, as well as geological units/soils that are unstable and provide mitigation measures to address any impacts of the proposed project.” (p “10 of 21”).

The evidence is clear – there is “the potential...for avalanches to occur on the subject site” and “potential for seismically-induced rock fall exists.” The IS states that the EIS will discuss mitigation measures for this, but we have never heard of a method that can provide 100% assurance that avalanches or rock falls will not occur. In areas where currently, methods such as using dynamite for avalanche control are used, there are still occasionally unplanned avalanches. Rock falls can not be 100% mitigated. Just consider how many times a rock has fallen onto SR 89 at Emerald Bay. It is of great concern that ~1,000 more people could be put in a dangerous situation. Further, that hundreds of these people may have their full time residences at South Base (and the 11 residence sites in between and 12 workforce housing units), and therefore be subject to these dangers full time.

- The FEIR/EIS must discuss this danger and provide the technical details behind the findings of the report mentioned in the IS. The FEIR/EIS must include risk assessment for these dangers, including existing conditions and any existing overnight uses currently in areas where these threats may occur and a comparative risk assessment for the proposed project and alternatives.
- The FEIR/EIS must discuss proposed ‘mitigation’ in detail, including the established level of effectiveness (for example, evidence indicates that in “10” areas where the proposed mitigation method has been consistently used, avalanches have occurred “#”times).
- The FEIR/EIS must clearly show where dangers exist, and at what level of risk, for all areas of the project site. For example, the avalanche danger to the residences at south base may be different than the danger posed to guests at north base.

- We recommend an alternative be considered which minimizes, if not outright eliminates, placing overnight accommodations in areas where threat from avalanches, landslides, and rock falls exist. ]

### **VIII. Environmental Thresholds, TMDL, Stormwater Treatment, and other Environmental Concerns:**

The FEIR/EIS must disclose the impacts of the project on all thresholds (some discussed specifically in this section), as well as other environmental concerns included below. As a CEP project, the project should provide substantial net gains for all environmental thresholds and concerns.

- 26
- [• The FEIR/EIS must document benefits required by the existing Regional Plan and benefits received in addition to those ‘baseline levels’ which justify this project’s approval for the CEP program. This should be presented in an easy to read, clear format, such as a table.

Article I (b) of the Compact states: “(b) ... *to establish environmental threshold carrying capacities and to adopt and enforce a regional plan and implementing ordinances which will achieve and maintain such capacities while providing opportunities for orderly growth and development consistent with such capacities.*” (Emphasis added)

The FEIR/EIS must analyze the impacts of the project on all thresholds. Further, because this is a CEP project, the FEIR/EIS must show how the proposed project provides benefits substantially above those required by the existing Regional Plan and threshold standards. ]

### **[Air Quality:**

Many of the air quality concerns relate to transportation impacts. More VMT means more tailpipe emissions and more re-suspended road dust. These pollutants affect human health, forest health, water quality and visibility. In some cases, more congestion also increases emissions due to increased emission rates from idling cars (e.g. carbon monoxide).

- 27
- The FEIR/EIS must assess the impacts of the projects on all alternatives on all federal, state and TRPA air quality standards. Emphasis must be given to carbon monoxide (Basin is currently classified as “maintenance” for conformity purposes on the CA side), ozone (ozone is in non attainment as designated by CARB in March 2010, measurements in the Basin have recently violated standards protective of human and forest health), and particulate matter (the Basin is also in non-attainment for Particulate Matter—PM 10 and PM 2.5). In all cases, there can be no net increase in these pollutants and rather, the project should produce a *net decrease* in all emissions.

- CARB standards are basin wide because air pollutants cannot be confined to specific regions. Air circulates- all people in the basin breath the air pollutants.
- Emissions from all transportation impacts must be disclosed for all trips within the basin including all combustion engines, VMT Basin-wide, congestion at affected intersections and roadways, etc..

28 [• Impacts to Air Quality from all non-transportation sources:

- Stationary sources (heating-related emissions, boiler emissions, other stationary sources);
- Fugitive dust during construction (include existing fugitive dust from project area);
- Re-suspended dust from the project area (e.g. parking lots and garages);
- Emissions from residential (and commercial, as applicable) outdoor barbeques, smokers, etc., and indoor devices which emit pollution such as restaurant grills. This should include emissions from the proposed kitchen at the mid-mountain lodge in addition to all such sources at the North and South Base.
- Any proposed prescribed burning for fuels reduction. We encourage restorative ecological burning when air conditions are ripe for burning (and the use of non-burning methods to remove biomass).

29 [Water Quality/Lake Clarity:

VMT and water quality:

Specific to water quality, the project proposes to reduce overall coverage, but at the same time, to add potentially over 1,000 more people to this area. Humans cannot visit this area without causing impacts. As discussed in the transportation section of this letter, even if the project could reduce vehicle use in the vicinity of the project, it would still be expected to increase VMT associated with people coming to and from the area. This will mean more runoff from all impacted roadways, more re-suspension of road dust that will float its way into the Lake (or add to the runoff into the Lake), etc. The HMR project area is typically accessed via Interstate 80 to SR89, Most residents and visitors will want to drive (even if waterborne transit can bring people from other parts of the Basin, non-local guests will still have to drive into the Basin). While many of the vehicle impacts we are concerned about relate to the time people will drive (e.g. peak vs. non-peak), re-suspended dust from VMT creates an impact regardless of the time of day. In the case of water quality, (and for the moment, disregarding whether guest travel while in the Basin will add VMT), we have significant concerns that the increased VMT associated with the cumulative, year round impacts of the 1,400 additional guests coming to and from the Resort (each weekend/week/etc.) will have water quality impacts (VMT is discussed further in the transportation section). Adding additional stormwater treatment (and capturing more sand and salt application before it can become airborne) along SR 89 in Homewood may help reduce impacts in the Homewood area, but it does not mitigate the rest of the roadways being traveled by arriving and departing guests.

- The FEIR/EIS must analyze the impact of VMT on water quality from arriving and departing guests on all roadways in the Basin.

Water Quality BMPs:

[ We appreciate the work HMR has done to date to benefit water quality (e.g. removing legacy roads) and are impressed with the resultant load reductions which have been quantified in prior presentations by HMR's consultant. We also understand work is ongoing and further load reductions are expected from restoration on the mountain. We support this work and look forward to learning more about the restoration projects as they move forward and hope that other projects containing substantial private forest lands will work to achieve similar reductions as HMR has already been doing.

30 We understand the new owners implemented BMPs previously required, but not done, by the previous owners. However, what would be helpful to understand is the difference between required BMPs in total and water quality benefits proposed by the project. We expect to see this addressed in the FEIR/EIS. The benefits in addition to those provided by "No Action" alternative (required BMPs only) must be very clearly defined in the FEIR/EIS.]

The FEIR/FEIS should disclose the areas that will be included in the proposed 500,000 sq. feet of restoration performed with the grant funding.

- 31
- Recognizing this work may already be completed by now, we would ask for an explanation of the project, methods, assumptions, inputs and any equations associated with the outcome of the project, and any further studies. If successful, will methods be applied to other parts of the project area in the future.]

[ Total Maximum Daily Load (TMDL) limits & Stormwater Treatment:

32 The TMDL information and data are available to assess the necessary load reductions needed to achieve water quality goals. For example, the TMDL has found that approx. 72% of the sediment entering Lake Tahoe is from (developed) urban areas. (This also includes re-suspended particulate which has become airborne but landed back on the surface to contribute to runoff, thus reiterating the importance of VMT to water clarity). **There is a need to significantly reduce impervious coverage and vehicle trips in order to reduce loads.** We must, at the same time, examine ways to effectively treat runoff. Unfortunately, sediment basins installed throughout the Basin have proven less effective at capturing the most important sediment size class – particles 20 microns and less in size (termed "fine sediments" in many water quality discussions). Thus, there remains the need to develop better treatment facilities that can capture the fine sediment before it enters Lake Tahoe (in addition to other preventative measures, such as removing land coverage and not approving development which increases runoff in the first place - we cannot "engineer" Lake Tahoe out of non-attainment of the clarity standard).

- The FEIR/EIS must disclose the load reductions which can be mitigated based on existing technology. We cannot simply assume that future (unproven) technology will be effective.
- We also look forward to the FEIR/EIS providing more information regarding the newer proven technology available that may be utilized at HMR. We understand HMR may also test new technology, but impact analysis should only be performed on technology already proven effective.

Finally, the project impacts must be compared to the TMDL findings and requirements. ]

33 [ Land Coverage:

HMR proposes to reduce overall land coverage, and the DEIR/EIS mentions 10% reduction but does not disclose how this reduction was calculated.

TRPA requires substantial land coverage reduction for this overall project. The increase in density and height must result in an overall reduction in land coverage.

We appreciate the work HMR has already done to restore legacy roads on the mountain. However, this is a CEP project and is therefore held to a higher standard than other projects. All CEP projects should have a coverage reduction goal at this point in the process as that is a key component of the 'net environmental gain' all CEP projects are supposed to achieve. ]

34 [ Deicing materials in parking garage:

Also, there will be more parking spaces. This will require more deicing in the winter months. Even if snow doesn't fall directly on lower levels of the parking garage, it may melt during the day and freeze at night. Will HMR sand and salt the parking garage? Or will there be built in heating under the pavement? If more deicing agents will be used, the impacts to water quality must be analyzed (as well as to vegetation). ]

35 [ Noise:

Community Noise:

The project will bring ~1,200 or more additional people into this small community. This will no doubt increase noise in the area (through vehicle noise, talking, radios, etc.). ]

36 [ Noise from Amphitheater:

The DEIR/EIS proposes a new outdoor amphitheatre for hosting outdoor concert events. There have been many problems with noise from these concerts over the years. There are serious concerns from local residents about the noise level from these events.

But even more so, the topography and layout of the Homewood community is likely to exacerbate the noise impacts of outdoor concerts. Sound may in essence 'echo or bounce' off the mountain. Additionally, residences are located right next to North Base (on both sides), whereas there is at least some distance between the concert venue at Harvey's and nearby residences. **The noise impacts from this outdoor amphitheater on the Homewood community will be substantial.** ]

37 [ Noise Impacts on Wildlife:

Noise impacts to wildlife in the area may also be substantial. Further, just south of the North Base is the "Homewood Wildlife Inc." – a local wildlife shelter that has existed there for years<sup>8</sup>. This shelter houses wildlife which could be disturbed by the noise from an outdoor concert. ]

<sup>8</sup> See the shelter's website at: <http://www.wildlifeshelter.org/>

38

- [• The DEIR/EIS must analyze the noise caused by the outdoor amphitheater and examine noise impacts throughout the Homewood community.
- The DEIR/EIS must examine the most recent science regarding noise impacts to humans and wildlife. This assessment must look at both chronic exposures, periodic exposures and acute exposures.
- The DEIR/EIS must assess impacts on wildlife, accounting for wildlife life cycles and how noise may affect wildlife different during different times of the year.
- We also hope DEIR/HMR will discuss noise impacts on the local wildlife shelter to make sure those wildlife, many of which are ill and recovering (and thus may be more affected by noise than healthy wildlife), are protected.]

Other Threshold and Environmental Issues of Concern:

39

- [• The DEIR/EIS must provide an existing inventory for the following (and the existing attainment status per TRPA's threshold standards) as well as an analysis of impacts to thresholds for each alternative:

- **Wildlife** within and affected by the project area (e.g. adjacent wildlife habitat that would be affected by activities and/or structures in the project area);
  - Affected wildlife include all special status species (any species with any designation from the USFS, TRPA, CA Fish & Game or other applicable entity);
  - FEIR/EIS should also analyze impacts to all wildlife, regardless of designation. Analysis and inventory should include any wildlife using the area for migratory or other 'temporary' purposes.]

40

- [• Impacts to **fisheries** from the project, both in Lake Tahoe and any impacts to riparian areas within, above and adjacent to the project area; Impacts may also occur through increased demand for water associated with limited water supplies.]

- [• Impacts to **scenic quality**. The FEIR/EIS must analyze impacts to views from Lake Tahoe (near the Homewood shoreline, mid-Lake and across the Lake, at a minimum), from the beach in Homewood, from SR 89 (both directions), from all hiking trails with views of HMR (not just exclusive to trails in Homewood), etc. Scenic impacts must provide a net benefit above and beyond that required by the existing Regional Plan. Visual simulations must be done for all of these aspects for each alternative.

41

- o We are also interested in an explanation for how adding 3-4 story buildings to an area with minimal existing height and relatively few buildings (and a relatively large view of the mountain) can provide a scenic improvement.]

- [• Impacts to **vegetation**. HMR has provided TASC with information regarding fuels reduction projects in the past, although we anticipate more information will now be available. The EIS must explain the prescription for thinning throughout the mountain (for each different 'ecological unit' – in other words, where the prescription varies) and the support for such prescriptions. Will removed biomass be sold commercially? Burned? Hauled away? We also encourage the use of

42



burn days for restorative ecological burning on the mountain and the removal of biomass through non-burning means wherever possible. ]

43

[• This analysis must also address other vegetation thresholds (in addition to those related to trees) and all other applicable vegetation standards. ]

44

[• The FEIR/EIS should also discuss invasive weeds and the impacts of all alternatives on providing opportunities for establishment and/or removal and prevention of invasive weeds. ]

45

[ The FEIR/EIS must distinguish between retail uses and recreational uses as defined by TRPA's thresholds and Regional Plan. ]

46

[• The FEIR/EIS must also assess project's lighting impacts on "night sky". This is an issue the public repeatedly expressed concern with during the P7 public workshops, and one we hope the new Regional Plan will address. ]

47

[• Because the project proposes to accommodate parking for boats launched on Lake Tahoe, the FEIR/EIS should analyze the potential for the introduction of invasive species to Lake Tahoe. We do not encourage increased boat launching due to the environmental impacts of motorized boat use; however, either way, might there be opportunities to host a boat washing station at the parking lot? Perhaps boat washing and inspections could be a combined program that all users must utilize before being allowed to launch across the street. ]

[

#### **IX. Open Space:**

In the 9/10 Staff Summary for APC, the applicant responds to TRPA's questions about open space by explaining:

##### ***"Response: PUBLIC & PRIVATE OPEN SPACE:***

*Both base areas include open space areas for both public and private use. The base area master plan graphic is being updated to more clearly identify these areas. The North Base includes a public ice skating pond to the east of the main lodge/hotel building. The ice pond is surrounded by public plaza area that will include fire pits, bench seating and other such pedestrian oriented amenities. Please refer back to the first response relating to architectural height, scale, and massing for further delineation of the open space concept. The South Base will include private open space as an amenity to the residential development. This would include a swimming pool for residents and trail access to the base slope." (p 44).*

48

It appears that HMR plans to call the center area in 'the village' structure at North Base "open space," including in that definition the ice rink, miniature golf, fire pits, benches, etc., much like the pedestrian area one sees in downtown Aspen (on the right), where cobblestone covers the ground, outlined by occasional grass areas, lamps-posts and



*Pedestrian Shopping area in Aspen, CO*

benches. At South Base, the “open space” would include a swimming pool.

It appears that the definition of “Open Space” is being used incorrectly.

Generally, the term “open space” has been applied to park-like areas, which in the Tahoe Basin, generally means open undeveloped forested areas where there are no buildings and no land coverage. In fact, TRPA (Chapter 18) defines open space as: “*Land with no land coverage and maintained in a natural condition or landscaped condition consistent with Best Management Practices, such as, deed restricted properties and designated open space areas.*”

- Clearly this definition does not include a ‘pedestrian village’ amidst tall buildings, shops and timeshare/condo units, nor a cobble-stoned covered area with benches and lampposts (note the first part of TRPA’s definition states “no land coverage.”).
- HMR cannot refer to this pedestrian village area (or ice rinks or swimming pools) as “open space.” We encourage HMR to inventory existing “open space” within the project area per TRPA’s chapter 18 definition. Then, HMR should include a net improvement in the amount of open space in the alternatives analyzed in the EIS. ]

#### [X. Mid Mountain Lodge:

We have several questions regarding this facility:

- 49
- The mid-mountain lodge, will add substantial coverage to this area on the mountain. What is the existing coverage (hard and soft) for this area? We understand this will be constructed where currently, a cement foundation exists. What size is this foundation? What coverage was permitted for this area in the past? Is there coverage here that has not been permitted? How does this compare to the proposed coverage of this lodge? ]

- 50
- [• Additionally, the proposal discusses transferring the vehicle shop/maintenance facility to the mid-mountain lodge. This requires that maintenance vehicles now drive up to the mid-mountain lodge. What are the environmental implications of this, as well as adding coverage to this area when compared to its existing location at So. Base? What are the land capabilities from the “transferred from” to “transferred to [mid-mountain]” areas? Finally, where is the next environmental benefit here? ]

- 51
- [• We suggest an FEIR/EIS alternative be included which minimizes the mid-mountain lodge so it is based on existing legal coverage. Also, we hope the lodge would be fully open to the public. ]

#### [XI. Development Allocations/Demand for Project:

- Evidence regarding the environmental and economic impacts of using these allocation rights at possible alternative locations (i.e. are there

opportunities to use these rights elsewhere within the NSCP?), must be included in the FEIR/EIS.

52

- This must include the impacts of using these units within the boundaries of the North Stateline Community Plan and the impacts of using these in the proposed project. The two locations are different in numerous ways, including topographical, social, transit-related, environmental, proximity to lake, economic, demographics, etc. The FEIR/EIS must analyze all of these parameters associated with the use of these units at each location before any conclusions can be drawn regarding the benefits (or consequences) of any proposed transfers.
- This assessment should also address the ability of each area to evacuate in the event of a wildfire or other emergency.
- Are there units within the same or adjacent watershed to Homewood that could be utilized instead? We question whether it is beneficial to transfer in- development allocations to an area that is already 'maxed out.'

53

Further, there is the issue of the size and use of the units. The units being transferred to HMR should be of the same size and nature as where the units are coming from. We do not believe it is an 'equal' transfer to 'exchange' (for example) a small, 300' hotel room and use it to construct a massive, 4 bedroom house or condo.

54

Decisions regarding the transfer of use cannot be made based on the assumption that a proposed project will be approved at some future date. The EIS must assess the impacts based on existing conditions. The cumulative impact assessment must then consider potential impacts from possible future projects.

55

Finally, there is concern with the cumulative impacts associated with transferring development from one end of the lake to almost the other end of the lake. There are site-specific issues associated with development in each location. We do not believe such transfers can simply be called 1:1, nor can transfers be assessed on an individual basis when cumulative impacts exist.

- The cumulative impacts must be considered for all proposed transfers to the HMR project, in addition to all proposed transfers from other current, proposed and anticipated future projects in the entire Basin.

Demand for Project:

56

We also question whether the existing market trends support the need for this additional housing for guests and whether there is adequate demand to support the small "mom-and-pop" type retail shops envisioned by the project (and typical "Smart Growth" concepts).

Currently, there are many homes, condos, timeshares, etc., for sale in the Lake Tahoe Basin. The economy remains on a downward trend. Many people are losing their first home, let alone a 2<sup>nd</sup> home. We question whether there is sufficient demand for an additional 349 units in Homewood.

- The FEIR/EIS must include information regarding existing market trends, demand for housing and /condo units, etc.
- The FEIR/EIS should also include an assessment of existing for-sale units within the vicinity of HMR, and a look at for-sale trends going back 5 years. If the market has been flooded with existing units for some time (e.g. 6 months, 1 year and longer), then does it make sense to develop more units for sale while existing units remain on the market? ]

57 [ Additionally, the concept of "Smart Growth," and design as proposed in this project, typically creates a vision of the small 'mom and pop' stores unique to an area, where residents and guests can walk to the shops from their accommodations. In fact, the public has repeatedly expressed an interest in retaining small locally-owned businesses in TRPA's Place-Based Planning Workshops, and it appears that HMR has envisioned small retail shops to reside at HMR. However, we question whether:

- (1) small business owners will be able to afford the cost of renting space in the absence of any kind of 'rent cap' (much like affordable housing, but for retail/small business rent); and
- (2) there is sufficient customer base to support such businesses.
  - a. Can a proportion of ~1,200 guests (probably far less during off peak periods and in shoulder seasons), and a town of 906 full-time residents, provide enough business to support a small locally-owned ice cream shop?
  - b. Why did the previous hardware store in Homewood close? Was it because the owners did not make enough money to afford it? Will there now be enough business to support a new hardware store, especially when this type of shop will not be frequented by guests at HMR, but rather, will rely primarily on locals coming from outside of the project? We understand locals expressed a desire for a local hardware store, and appreciate HMR's interest in meeting the local's interests, however, the local population base may not be enough to support such a business at HMR.
  - c. What is the cumulative full time population of adjacent communities (at least those far enough away from Tahoe City that they would be more likely to go to HMR for the retail shops vs. Tahoe City – perhaps draw a line 3.5 miles from Homewood to the North and 'count' communities south of that line as HMR customers and north of that line as Tahoe City customers)? ]

58 [ We are concerned that in the absence of adequate market demand, HMR may be another large redevelopment project that exceeds demand. For example, the redevelopment at Stateline (in SLT) suffers from numerous unoccupied retail shops, since business owners did not make enough profit to afford the high rent. And yet the pedestrian traffic at Stateline far exceeds that which would be accommodated at HMR, even if the proposed project were constructed. This should serve as a warning to duplicating the redevelopment that occurred at Stateline (let alone with fewer customers). However, high rent is not the only problem. Small, locally-owned businesses are closing up all around the Basin, including in areas with (typically) more affordable rent. Without adequate full time population to support businesses, many can simply not afford to stay in the Basin. We are concerned that the project is relying heavily on the tourist population

to support local businesses, and this may result in future unoccupied developments (creating economic, social and environmental impacts). ]

59 [ **XII. Employee housing:**

The project proposes 13 workforce housing units, suggesting this can accommodate up to 36 employees.

- More analysis is needed on the number, type and pay range of existing jobs on the property and the same for jobs resulting from the proposed project. Additionally, what is the expected 'cost' (e.g. monthly rent, purchase price, etc.) for workforce housing and how does this compare to the jobs that will result at the project? Will employees of the new "village" be able to afford the 13 workforce housing' units?
- What is the discrepancy between the on-site workforce housing [estimated to house 34 employees] (assuming employees can afford it) and the total number of employees? Where will the 'additional' employees live? Is there enough affordable housing?

HMR needs to identify affordable housing for employees, but we do not feel it is appropriate, nor environmentally sound, to locate employees very far away from the actual project area. An employee housing plan needs to be provided. ]

60 [ Although shuttles may help transport employees to and from HMR without their individual vehicles, there will be occurrences where employees will drive themselves to work. Perhaps they will park on a back street far enough away from HMR's proposed "enforcement" of neighborhood streets. Or, perhaps they drive to a parking lot in Tahoe City and then take a shuttle. Regardless, this will add VMT to the Tahoe Basin. It does not matter that the impacts will occur off the project site – they will occur as a result of the proposed project.

- What evidence exists that employees will be willing to live so far away from where they work? (Also taking into account the pay and type of jobs the project will create). ]

61 [ If HMR establishes affordable housing for its employees in another state and county, this will in essence burden the other state and county with the additional costs of supporting those employees – and mitigation for the environmental impacts they cause (e.g. VMT).

- In sum, the EIS HMR must analyze alternatives for locating affordable housing for employees in the project's immediate vicinity (Homewood). Another alternative should assess opportunities perhaps within 10 miles of the project area (both ways)
- As discussed throughout this letter, the developer must analyze a smaller scale project alternative. This alternative should assess affordable housing opportunities in the vicinity of Homewood. The project's size should not require more employees than housing is available for near the project site. ]

[ **XIII. Cumulative Impact Analysis:**

62 [ The cumulative impacts assessment must include the entire Lake Tahoe Basin, since every project in the Basin which draws visitors (or residents) to the Region will have an impact Basin-wide, not only because it is one watershed draining into one Lake, but also because those people will, at some point, drive to other areas of the Basin, thus creating vehicle related impacts somewhere else. The list of projects which must be assessed in this analysis include, but are not limited to:

- The 8 other CEP projects, such as:
  - 5 projects in Kings Beach and Tahoe Vista;
  - Boulder Bay project at No. Stateline (Crystal Bay);
  - 2 projects at SLT "Y"
- Sierra Colina Subdivision (near Kingsbury Grade area)
- Sandy Beach (Tahoe Vista)
- Beach Club (Kahle Drive, near Kingsbury Grade area)
- Redevelopment at So. Stateline (e.g. Convention Center, assuming it is built someday)
- Gondala Vista Timeshare Project
- And all other projects being contemplated by TRPA at this time.
- Projects outside of the Basin which will draw visitors to the Basin.<sup>9</sup> ]

63 [ The cumulative impacts assessment must evaluate impacts to all TRPA environmental thresholds. However, being a CEP project, the analysis must also include those environmental parameters recognized as important but not included in the existing (outdated) Regional Plan (but expected to be addressed in the new Regional Plan, which we feel should be updated *prior to* approval of these large CEP projects), including:

- Fine sediment (sediment less than 20 microns) and phosphorous loading to Lake Tahoe (impacted by the development and associated VMT),
- Atmospheric deposition of particulates and phosphorous (largely correlated with VMT).
- **Include all** additional vehicle trips and VMT.
- Impacts on night sky from lighting.
- Impacts of placing more people in areas at risk for wildfire.<sup>10</sup> ]

64 [ The cumulative impact analysis must also include:

Air & Water Quality:

- The additional boats brought to the Basin and launched into Lake Tahoe due to this project and the cumulative effect of all other projects that will increase watercraft boat usage on Lake Tahoe.
- Emissions from the use of those watercraft (not just the truck pulling them); ]

[ Natural Resource Protection from Recreational Impacts:

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<sup>10</sup> We encourage HMR and TRPA to review the "Dangerous Developments" Report published by the Sierra Nevada Alliance in 2007.

- Recreation-based impacts from additional people (e.g. increase use of hiking and biking trails, off-highway vehicle trails [especially given proximity to McKinney-Rubicon OHV Area], etc.).
  - For example, the additional people staying in Homewood at this project may go hiking in Desolation Wilderness during their stay. The USFS 1988 Forest Plan states: “Desolation Wilderness is one of the most heavily visited areas in the wilderness system...In [1979] a quota on overnight visitors was initiated to prevent overuse. Day use continues to increase, which may be affecting the quality of the wilderness. Demand for entry into Desolation Wilderness will continue to increase and probably would not be reduced by offering other destinations.” Adding people to the day use at Desolation Wilderness will create additional impacts to that area. Taken with the thousands of additional people that would be brought into the Basin by the cumulative group of all proposed and expected projects, the impacts to Desolation Wilderness could be extremely substantial.
  - What would be the impacts on the Granite Chief Wilderness?
  - What about other trails, including the Pacific Crest Trail, Tahoe Rim Trail, and other popular trails such as the Meeks Bay Trail? ]

65 [ **Alternatives to be considered include those mentioned throughout this comment letter.** The community has clearly requested an alternative that represents a much smaller project. A smaller scale project should be considered, rather than a minor reduction based on a revised mix of uses. ]

66 [ Further, there is no mention of what the building footprint and square foot build-outs would be under the proposed alternative 1 or any of the alternatives. This information is crucial to the understanding of the proposed scale of the development vs. the existing development, as is the proposed hard coverage of the project vs. the existing hard coverage of 288,277 sq ft. This information should be provided to the public. See DEIR/DEIS, p.14-52. ]

#### 67 [ **XIV. Height and Code Amendments:**

68 The proposed project requires Code amendments and Plan Area Statement amendments for additional height. Numerous code amendments are requested for the proposed project including amendments on height, multi-family residential use and groundwater, all of these having a major impact on the size and scale of this development. The CEP states on page 3, “The CEP is not a code avoidance program.” As a CEP demonstration project, the HMR project should follow the CEP guidelines and code amendments should not be permitted.

We are also very concerned with the method that has been used to compare this proposed project. The DEIR/EIS compares the proposed project, to conditions which assume the code amendments have been granted, not to existing conditions at the site. This is a disservice and a misrepresentation to the community of the impacts of this project. The public would assume that a comparison would use existing conditions, not considering

code amendments that have not yet been granted. TRPA, as a watchdog agency charged with protecting Lake Tahoe, should not allow such a misrepresentation to occur. The public should know what the actual proposed changes are as compared with existing conditions. This information is critical to the full disclosure to the public of the impacts of this development and should be rectified and provided to the public as soon as possible..

Additionally:

- The DEIR/EIS must clearly identify the maximum height for all buildings in all alternatives, and identify how the maximum height compares to existing allowable height. We believe the numbers offered in the DEIR/EIS to be confusing.

However, we believe this is another aspect that should first be identified and adopted through a Community Plan process. ]

[ **XV. Community Enhancement Program (CEP) Project:**

This is a CEP project, which must result in net gain threshold improvements (above those required by the existing Code).

- The EIS must specifically identify the existing requirements and the additional benefits provided by the project for all thresholds. This information must be provided in a clear format the public can easily understand. For example, first include (via a tabular format) what is required for projects under the existing Regional Plan and what will be required for this CEP project. Next, provide this comparison based on the existing thresholds (and other parameters of concern that are expected to be included in the new Regional Plan, as discussed in the next bullet [e.g. sediment reduction from air and water sources]).
- Improvements do not have to be bound by the existing thresholds categories – and should not. Recent science indicates that existing thresholds do not encompass the full suite of environmental parameters we must consider. One example includes the need to reduce greenhouse gases, as discussed previously. Another example includes the need to reduce atmospheric particulate matter and phosphorous loading to Lake Tahoe. Additionally, the TMDL may not be finalized yet, but the information gathered for the TMDL is valid, and tells us that ~72% of the sediment going into Lake Tahoe comes from urban areas. However, we have also learned that the existing settling ponds and other techniques we've installed to reduce particles aren't sufficient. Many ponds may reduce the larger particles entering the Lake, but fail to reduce the fine sediments that are most responsible for the loss of clarity.
  - All current parameters of concern must be examined, many of which have already been identified in Pathway 2007 documents. The proposed project should achieve net reductions for all parameters of concern, not just those based on existing thresholds. TRPA should not approve any project that

69



will not help achieve environmental objectives identified for inclusion in the new Regional Plan simply because the update is overdue.

- The CEP program was also intended to ‘test’ new development concepts for their ability to help achieve thresholds. What “new” concepts are being proposed (including the evidence supporting the anticipated benefits of these new concepts) and how the project will help attain all of TRPA’s thresholds (for all alternatives analyzed). What actions will TRPA and the developer take if ‘new’ concepts are not successful to prevent impacts from the project.
- The project’s contributions to EIP projects must be identified. ]

70 [ **XVI. Leadership in Energy and Environmental Design (LEED):**

We appreciate HMR’s efforts to achieve LEED certification and apply the same concepts to the South Base, although it is not eligible for LEED certification. It is clear that building more responsibly is important to HMR’s owners, and we hope HMR will endorse this approach for *all* alternatives – even those based on a smaller scale project. ]

71 [ **CONCLUSION**

The Tahoe Area Sierra Club does not support over-development but supports a Homewood development that is compatible with the environment and the rustic quality of Homewood and the West Shore. The TASC is committed to supporting projects that comply with the current rules and regulations of the TRPA and the threshold standards. Please consider the concerns of the TASC and the community as expressed in this letter in your decision-making process. ]

Thank you for consideration of our comments.

ATTACHMENT 1



MEMORANDUM

November 26, 2007

TO: Fire Defensible Space / BMP Retrofit Partners

RE: Information on water usage at Lake Tahoe obtained from Utilities

FROM: Jane Schmidt, NRCS

The following information was provided by representatives of 4 utilities providing water service in the Lake Tahoe Basin (Incline Village GID – Madonna Dunbar, South Tahoe PUD – Shelly Barnes, North Tahoe PUD – Lee Schegg, and Tahoe City PUD – Bob Lourey). Recommendations for using vegetation for ground cover should take into consideration the current situation of the municipalities and companies delivering water for residential use.

1. *Approximate number of customers provided water service?*

72  
Incline Village GID: 4,200  
South Tahoe PUD: 14,000  
North Tahoe PUD: 3,468  
Tahoe City PUD: 3,800

2. *What are the trends in water usage in residential areas, and what is the explanation for these trends?*

Incline Village GID: See a 50% - 60% increase in water usage in the summer, all attributed to irrigated turf.

South Tahoe PUD: Water usage triples during summer months, due to irrigated turf.

North Tahoe PUD: Experiencing an increase in water usage about 3 times the amount used 20 years ago. Believe increase is tied to a continuous increase in landscaping (not only irrigated turf) by property owners, as home values have steadily increased over the years.

Tahoe City PUD: Have seen an increase in water usage, and attribute this to more landscaping installed over time. Perceive an increase in irrigated turf, but also see trends such as heavy watering of native manzanita in some neighborhoods.

3. *What are your approaches to addressing water conservation issues?*

Incline Village GID: Lawn size is regulated according to lot size. Water audits are offered and conducted by the GID to educate residents on their opportunities to reduce water usage.

South Tahoe PUD: Watering is permitted on certain days, only. 2007 was the first year of the "Turf Buy Back" program (see attached information from their website).

This program targets the replacement of residential irrigated turf with other plant species that require less water to maintain. Mulch materials are also prescribed. Generally, a minimum of 400 square feet of lawn must be converted for a property owner to participate.

North Tahoe PUD: If water is put to beneficial use, then the use is considered acceptable. However, the District must rely on storage to meet peak demand. Currently, they are challenged to keep up with demand, and may need to increase storage capacity. The County is currently considering water conservation provisions.

Tahoe City PUD: Residential water meters will be installed during 2008, and as of January, 2009, all residences will be on a rate based system. The District is hopeful that paying for water usage based on metered use will act as an incentive for water conservation.

4. *What, if any, concerns do you have with irrigated turf?*

Incline Village GID: Residential irrigated turf leads to increased fertilizer use, runoff from the fertilizer use negatively affects drinking water quality, and as the water quality declines, the current exemption to provide filtration for drinking water may be threatened. This issue is of major concern to the GID, as filtration requirements would be very expensive to implement.

South Tahoe PUD: Irrigated turf is not native, leads to over fertilization and nutrient runoff polluting water quality, it does poorly in many areas due to shade cover from trees, and therefore many lawns are poorly established.

North Tahoe PUD: Would not recommend any program that encourages more water usage by residential landowners.

Tahoe City PUD: Understand the desire for some irrigated turf by homeowners, but would like to see reasonable amounts of turf used, in combination with appropriate xeriscape landscaping to reduce water consumption.

5. *Options they favor to replace irrigated turf.*

Incline Village GID: Main approach is to reduce the size of irrigated lawns. Recommend low water usage ground cover vegetation such as Mahala mat, thymes, etc. Utilize plant lists in *Home Landscaping Guide*.

South Tahoe PUD: See attached information sheets on the Turf Buy Back program. Recommend general categories of plants, and require a 50% plant (canopy) cover at maturity for replacement of turf.

6. *Other comments.*

Incline Village GID: District also manages a pine needle recycling program. Contractors buy the pine needles, for use in CALTRANS road projects, etc. In 2007, 232 tons of needles were collected from residents in the Incline Village, Crystal Bay, Kings Beach area. They estimate that perhaps 25% of the residents participated in this program.

South Tahoe PUD: Largest utility in the Basin. Water usage reached a record high during the Angora Fire in 2007. The utility is concerned about their ability to meet

peak demands on the water system during emergencies because of the draw on wells that support fire hydrants.

North Tahoe PUD: The utility is concerned about water delivery issues to hydrants used for fire fighting. Under current water demands and current storage capacity, storage tanks must refill overnight in order to meet the typical demands on a summer day.

Tahoe City PUD: There is not an unlimited water supply, even if the utility district is in compliance with safe drinking water standards. Currently, the utility makes over 90% use of groundwater wells; unless water usage patterns decline, there may be a need to develop new sources. Returning to the Lake for additional water may need to be considered. ]

Tahoe Swiss Village Homeowner's Association, Inc.  
P. O. Box 326  
Homewood CA. 96141

April 18, 2011

Tahoe Regional Planning Agency  
Homewood CEP  
P. O. Box 5310  
Stateline NV 89449-5310

Attention: Jeff Cowan / David Landry

Fax# 775 588 4547

Re: Homewood Mountain Resort EIR/EIS


Dear Mr. Cowan;

The HMR EIR/EIS refers to "... APN 08502048W11, operated by Agate Bay Water Company. ..." on Pages 15-31 and 15-115 (attached) in Chapter 15. The APN number (APN 08502048W11) is one of two parcels composing the beach belonging to the Tahoe Swiss Village Homeowner's Association, Inc., a common interest property. We also request the opportunity to examine the supporting documents and respond.

We would like to know the source of the information including who provided it, any and all documentation of the claims, and any references to the scope of any claims to the parcel, including structures, pipes, water mains, and intakes, etc.

The parcel (APN 08502048W11) is located approximately one and one half miles north of the proposed Homewood Mountain Resort and there is an Intervening Water Company (Madden Creek Water Company) between Tahoe Swiss Village Utility and Homewood Mountain Resort. We would like to have any information as why this parcel is listed as a source?

Agate Bay Water Company is located miles away on the North Shore of Lake Tahoe from Tahoe Swiss Village which is located on the West Shore in the area served by Tahoe Swiss Village Utility. What is the source of information and any we would like any and all documents relating that assertion?

Sincerely, 

Warren V. Hagberg, President

Tahoe Swiss Village Homeowner's Association, Inc.

P. O. Box 326, Homewood, CA. 96141- e mail [MarWarH@aol.com](mailto:MarWarH@aol.com) - Fax # 650 212 4946  
Contact # 650 212 4946

cc: Mr. Drew Briner, Attorney at Law

Attachments: Pages 15-31 and 15- 115 HMR EIR/EIS

X Source water 09719101/11, operated by TCPUD and source water 08502048W11, operated by Agate Bay Water Company are located in the vicinity of the Project area. However, TRPA Source Water Assessment maps indicate that no source waters are located within 600 feet of the Project area.

The HMR Water Supply Assessment (Nichols 2010) was prepared for the Project area, which is attached in Appendix AA. Public water supply is further analyzed in Chapter 16, Public Services and Utilities.

### **Community Enhancement Program**

The focus of the TRPA Community Enhancement Program (CEP) is to implement projects that demonstrate substantial environmental, as well as, social and economic benefits through mixed-use development projects on existing disturbed and/or underutilized sites. The CEP is based on the concept of net gain to achieve improvements that benefit the built and natural environments (TRPA 2007). One of the goals of the CEP is to provide area-wide (not parcel by parcel) urban water quality improvements that leverage private investment for environmental gain, linking existing or future systems, and providing long-term monitoring and maintenance.

The February 5, 2008 Memorandum for Conditional Reservation of Allocations – Homewood Mountain Resort (Governing Board Resolution) outlines the following requirements that relate to EIP projects for CEP participation:

*For commodities to be reserved and projects to be approved, CEP projects must commit to substantial environmental improvements, which must include specifically identified EIP projects. The Project proposes a number of environmental benefits/improvements. TRPA requires written commitments regarding the funding, construction, and overall maintenance/monitoring for the specific EIP proposals. Some EIP components that were discussed in the pre-application or in verbal conversation are listed below:*

- a. TRPA supports storm water from SR 89 and the Project area being diverted to properly sized treatment facilities that are constructed and maintained by Homewood Mountain Resort. Provide details and commitments regarding the Homewood water quality improvements and how they will be integrated with the Caltrans water quality improvements and the Placer County Homewood Erosion Control Project. Specifically, evaluate and specify the quantifiable reduction of sediment loads entering Lake Tahoe in the Homewood area garnered through the construction of these targeted water quality facilities.*
- b. Provide design and written commitments for the implementation of the bike trail improvements referenced in the CEP application through the Homewood Project area.*
- c. Provide details and commitments regarding the under grounding of the utilities that cross the Homewood site.*
- d. Provide details and commitments regarding the day-lighting of the creek under the ski-bowl (new residential area) parking lot. Also, explore possibilities to restore creek/SEZ along proposed cat road between base areas.*
- e. Additionally, consider participation in the SR 89 re-alignment EIP project # 855 at Tahoe City.*

**Judy Nikkel**

---

**From:** Chris Adams <cadams@cbre.com>  
**ant:** Monday, April 18, 2011 1:33 PM  
**To:** Judy Nikkel  
**Subject:** Homewood DEIS Comments

21

Judy Nikkel

Dear TRPA,

1 [ I am concerned with the JMA project, as currently proposed. My primary concerns are:

2  
â€¢ Traffic and air pollution.]

3  
â€¢ [ The proposed 77' height for the lodge is absolutely too high.]

Thank you, Chris Adams

Chris Adams  
6340 Pinehaven  
Oakland, CA 94611

[Reply](#)[Reply All](#)[Forward](#)**Homewood DEIS Comments**

Jack Albanese [jack10436@gmail.com]

**Sent:** Tuesday, April 19, 2011 5:01 AM**To:** Homewood DEIS Comments

22

Tahoe Regional Planning Agency  
Tahoe Regional Planning Agency  
Boulder Bay CEP  
PO Box 5310  
Stateline, NV 89449-5310  
US

Dear TRPA,

[ We want Tahoe protected and left alone from further development in the area. Please reject the plans for Homewood DEIS.

We visit the area and want keep visiting Tahoe for years to come in the way it is today - pristine and safe from development.]

Jack Albanese  
525 Marcellus Road  
Williston Park, NY 11596



Judy Nikkel

**From:** Adolph Andrews <adolphandrews@yahoo.com>  
**ent:** Monday, April 18, 2011 4:05 PM  
**To:** Judy Nikkel  
**Subject:** Homewood DEIS Comments

23

Judy Nikkel

Dear TRPA,

As a substantial property owner at Lake Tahoe, I strongly object to the Homewood Expansion Project in its present form. The current project plan will increase traffic congestion on the west shore and will urbanize an unspoiled portion of the lake. Also, the proposed building height will establish a new standard in the Basin.

5 I urge you to structure a project that conforms with Tahoe's current regional plan and incorporates more significant environmental benefits than those currently proposed.

Very truly yours,

Mr. Adolph Andrews, Jr.

Adolph Andrews  
600 Montgomery Street, 35th Floor  
San Francisco, CA 94111

**Judy Nikkel**

---

**From:** Gloria Aquilino <gaquilino@sbcglobal.net>  
**ent:** Monday, April 18, 2011 10:36 AM  
**To:** Judy Nikkel  
**Subject:** Homewood DEIS Comments

24

Judy Nikkel

Dear TRPA,

I [I approve the proposed changes @ Homewood Resort. I look forward to the much needed improvements to the area.]  
Thank you.

Gloria Aquilino  
201 Mankato Place  
Homewood, CA 96146

**Judy Nikkel**

---

**From:** David Arntz <darntz@arntzbuilders.com>  
**ent:** Monday, April 18, 2011 6:05 PM  
**To:** Judy Nikkel  
**Subject:** Homewood DEIS Comments

25

Judy Nikkel

Dear TRPA,

/ [ Please don't let this project move forward! We need to keep Tahoe the jewel of the Sierras! ]<sup>2</sup> Hwy 89 already experiences too much traffic in the summer and the winter without through traffic this would be a nightmare at the Y in Tahoe City. ]

David Arntz  
221 Winding Creek  
Olympic Valley, CA 96146

**Judy Nikkel**

**From:** andrea arntz <vickelsey@aol.com>  
**Sent:** Monday, April 18, 2011 12:38 PM  
**To:** Judy Nikkel  
**Subject:** Homewood DEIS Comments

26

Judy Nikkel

Dear TRPA,

My family and I own a home in Squaw Valley and spend a lot of our free time in the Lake Tahoe Area. We have a boat that we keep in the Homewood area.

1 [ My objections to the project are that the West Shore has always exuded an 'old Tahoe' charm, which will be spoiled by such a tall building ] and the increase in traffic along 89. [ I do not think it is a good idea to permanently change the building height codes. The one tall building in Tahoe City remains an eyesore. ] 3

4 [ I understand that the Homewood Ski Area would want to expand and improve but I believe it can be achieved in a way that does not impact the environment and the local community as much. ]

andrea arntz  
242 evergreen drive  
Berkeley, CA 94704

**Judy Nikkel**

---

**From:** Allan Arntz <allan@arntzbuilders.com>  
**ent:** Tuesday, April 19, 2011 11:01 AM  
**To:** Judy Nikkel  
**Subject:** Homewood DEIS Comments

27

Judy Nikkel

Dear TRPA,

- 1 [The present infrastructure can not support this planned development.]
- 2 [Unless another means of site access, other than the route through Tahoe City, can be found it should not be allowed.]
- 3 [The present traffic situation is already a big problem during the summer season, as well as popular dates during the ski season..]
- 4 [I am certain that added air polution will impact the Tahoe basin in a negative way]

Allan Arntz  
19 pamaron way  
Novato , CA 94949

**Judy Nikkel**

---

**From:** Justine Aylmer <justine.aylmer@gmail.com>  
**ent:** Tuesday, April 19, 2011 11:13 AM  
**To:** Judy Nikkel  
**Subject:** Homewood DEIS Comments

28

Judy Nikkel

Dear TRPA,

1 [Lake Tahoe is already developed enough.]<sup>2</sup> Please don't allow Homewood to build above and beyond regulations, setting a worrisome precedent in the process. What's done is done, but we should avoid further development now and work on making already developed areas better. Homewood can be updated and improved without infringing on the area's  
3 natural beauty.]  
Thank you for all you do for the area.

Justine Aylmer  
177 Tramway  
Stateline, NV 89449

## Homewood DEIS Comments

Karen Bachand [kbachand@aim.com]

**Sent:** Tuesday, April 19, 2011 9:40 AM

**To:** Homewood DEIS Comments

29

Tahoe Regional Planning Agency  
Tahoe Regional Planning Agency  
Boulder Bay CEP  
PO Box 5310  
Stateline, NV 89449-5310  
US

Dear TRPA,

[ Please do not approve this project. If you read Thomas Bachand, Tahoe, A Fragile Beauty, you will understand that the eco-system there is tenuous. Adding another development will just hurt the lake more. I urge you to consider not going through with this project. ]

Karen Bachand

Karen Bachand  
85 Reiner Street  
Apt. 218  
Colma, CA 94014

## Homewood DEIS Comments

CLIFF & DOROTHY BACHAND [rossick@sbcglobal.net]

Sent: Monday, April 18, 2011 4:51 PM

To: Homewood DEIS Comments

30

Tahoe Regional Planning Agency  
Tahoe Regional Planning Agency  
Boulder Bay CEP  
PO Box 5310  
Stateline, NV 89449-5310  
US

Dear TRPA,

1 [ WE HAVE ENJOYED A HOME IN TAHOMA FOR 30 YEARS AND HAVE SEEN HOW THE NATURAL BEAUTY OF  
THE AREA IS GRADUALLY BEING TRANSFORMED WITH HUGE HOMES TAKING OVER SMALL COTTAGES. NOW  
THIS PROPOSAL FOR THE HOMEWOOD AREA WILL TRANSFORM OUR WEST SIDE INTO A MEGA COMPLEX  
TOWERING OVER ALL OTHER PROPERTY. ] [ THE TRAFFIC SITUATION WILL BE DEADLOCKED. DURING THE  
2 SUMMER, THE BACKUP TO TAHOE CITY IS BETWEEN 100 TO 200 CARS AT SOME HOURS. WHAT WILL  
HAPPEN WHEN ALL THESE CONDOS ARE BUILT? ] [ THIS DOES NOT EVEN ADDRESS THE ENVIRONMENTAL 3  
DEGRADATION OF THE LAKE FROM SOIL RUNOFF, ] [ CARBON EMISSIONS ETC. ] 4  
5 [ WE RESPECTFULLY ASK THAT THIS PROJECT BE NOT ALLOWED TO GO FURTHER. ]

CLIFF & DOROTHY BACHAND  
318 BRYAN DRIVE  
ALAMO, CA 94507-2858



31

[Reply](#)[Reply All](#)[Forward](#)**HMR, Homewood Development**

Dado Banatao [dado@TallwoodVC.com]

**Sent:** Tuesday, April 19, 2011 3:15 PM**To:** Homewood DEIS Comments**Cc:** Ralph Peer [ceo@peermusic.com]

To whom it may concern,

I am a member of MBIA, an association of homeowners in Tahoma. I want to voice my deep concern that if this project is approved, the negative impact on traffic, noise and the environment will be unbearable and the character of the neighborhood will be forever lost. If the project proceeds we will exercise our legal rights to protect the neighborhood.

Respectfully,

Dado Banatao  
Managing Partner  
Tallwood Venture Capital  
400 Hamilton Ave., Ste. 230  
Palo Alto, CA 94301

Judy Nikkel

**From:** Robert Basso <robertbasso@comcast.net>  
**ent:** Wednesday, April 20, 2011 1:29 PM  
**To:** Judy Nikkel  
**Subject:** Homewood DEIS Comments

32

Judy Nikkel

Dear TRPA,

- 1 [ With respect to the proposed Homewood project, we feel strongly feel that the proposal as presented should be rejected.] There will be significantly negative impacts on the already existing traffic congestion (most especially during the summer) on SR 89, parking, air quality, water availability and lake clarity. Any development must fit into and be considerate of the surrounding enviornment and community. The West Shore is a treasure onto itself and the residents, both full and part time, have invested considerable time and energy, not to mention, dollars in preserving its pristine natural enviornment. Homeowner Associations place significant restrictions on buildings, additions, etc. to preserve the beauty and serenity of the area. The size and scope of the Homewood project, not to mention the construction timeline, will disrupt significantly and forever, the lives of those residents. A multistoried, 99 unit development project is being proposed simply to generate a return on investment for the outside investors at the expense of the existing homeowners, their guests and summer renters.]
- 11 [ We are not against new development, per se, but only against projects of this magnitude. Have the devlopers reapply with a major down scaled approach, that is considerate of the community and perhaps that might be acceptable.]

hank you.

Bob Basso

Robert Basso  
4505 Lucerne Ct.  
Homewood, CA 96141

April 19, 2011

Tahoe Regional Planning Agency  
P.O. Box 5310  
128 Market Street  
Stateline, NV 89448  
Contact: David Landry, Project Manager  
Phone: (775) 589-5214  
Fax: (775) 588-4527  
Email: [homewooddeiscomments@trpa.org](mailto:homewooddeiscomments@trpa.org)

County of Placer  
Community Development Resource Agency  
Environmental Coordination Services  
3091 County Center Drive, Suite 190  
Auburn, CA 95603  
Contact: Maywan Krach, Community Development Technician  
Phone: (530) 745-3132  
Fax: (530) 745-3080  
Email: [cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov)

**RE:** Homewood Mountain Resort Ski Area Master Plan CEP Project, Draft  
Environmental Impact Report/Statement

To Whom It May Concern,

Thank you for taking the time to read, consider, and respond to this letter. I am writing to express the opinion and facts of many local businesses, home-owners, second home-owners, and visitors.

My family and I own a home on the West Shore and have lived in Tahoe full-time for over sixteen years. My children attended and graduated from the local public schools. I have invested much time and money in local programs that I feel are worthy. Furthermore, I have been a local business owner for sixteen years. In my business practice I use local businesses and people for goods and services when possible. My family recreates in and around Homewood and has for many years. Our family members are long-time season passholders of Homewood and Alpine Meadows. Our retirement plans include living out our lifetime at Tahoe and passing down our West Shore home to our children and grandchildren. Our investment of time and money for this long-term asset is substantial. We have taken, and continue to take, great precautions to preserve this for many future family generations.

From the time Homewood Mountain Resort released its Notice of Preparation (NOP), I have engaged visitors, local residents, HMR staff and friends about the development proposal, trying to educate myself as best as possible in order to formulate an opinion.

After thoroughly learning about the project I would like to express that I do not support the project as proposed. My concerns with the current proposed project focus on the density, height, water supply, pollution, noise, traffic and parking. These are just a few of my concerns, which are rising issues that have become normal for many communities and ski areas in and out of the Lake Tahoe Basin, due to a lack of responsible planning and development. I do not want to see this happen to Homewood, for it is one of the last true preserved areas of Tahoe. It is important to note that I AM in favor of a scaled down version of the proposed project that is consistent with the local environment, community character and overall area. As proposed, the Homewood Mountain Resort Ski Area Master Plan Proposal is not consistent with Homewood's environment, community, character and surroundings.

My concerns with the Homewood Mountain Resort Ski Area Master Plan Proposal are as follows. I would appreciate it if these concerns are responded to in a concise transparent format and considered when making recommendations and decisions about the proposed project.

Please note that I will not address the topics of alternative transportation and power, ie. water taxis, shuttles, electric cars, Hydro and geo-thermal power, etc. It is my opinion that these ideas have become "buzz" words with the overwhelming "green" trend and that they are used as a marketing strategy to assist in selling this project to a larger market.

Thank you.

### Density and height

The proposed project off of Tahoe Ski Bowl Way proposes a 99 unit condominium complex. See DEIR, p. 3-19. This is too dense for the location and has a very large footprint. This will increase density, along with traffic, water usage, increased garbage, pollution and noise. Historically and factually, condominium complex developments lose property value more rapidly than single-family homes. This low cost construction along, with shared ownership, will accelerate deterioration and, promotes dilapidation of buildings. Furthermore, this type of development will create a loss of local property value, due to density and deterioration. Overall, this type of cluster development is not consistent with the existing Homewood homes, lodges, and cabins.

The denial of public access and parking at Tahoe Ski Bowl Way should NOT be allowed.

The provided parking at the South Base is much needed parking and provides necessary space for future parking. Also, I am not in favor of the Quail Chair becoming a private lift for Condominium owners, VIP's, and select home-owners. Although the DEIR does not address this, it is a personal concern due to the proposed denying of public access to the South Base. The proposed exclusive access and boundaries take away one of Homewood's most prized assets, open space and access for all to enjoy and recreate.

27 [Also, I would like to see the current proposed project scaled down to a size that is compatible with the surrounding community and its unique character. This type of project would create less of an impact, have a smaller footprint, and would include quality design and construction, ascetically blending with the environment and with long-term investment ownership encouraged.]

28 [After reviewing the DEIR/DEIS I learned that the North Basc Hotel building is 77 ft. high, depending on which height determination is used. See DEIR, p. 10-29. This height amendment should not be considered as the Hotel building proposed height will overburden the area.] Additionally, we ask that story poles be erected as soon as possible (before project approval) in order for the local community to fully understand the height amendment and the mass and scale of the overall project.]

29  
30 [On a different note, all the renderings and computer aided models indicate many more old growth trees surrounding the Hotel building and grounds than what is actually there, or can be planted. The Hotel building and adjacent grounds will have far less trees than is being shown, thus the height and overall size and scale will seem even greater.] Also, a hotel and building of this size and number of rooms, will not economically sustain itself, creating a negative result to the environment and the surrounding Homewood community. This building is TOO large for the area.]

32 [Please consider a scaled down version of the proposed Hotel building; a smaller, lower building that would not overburden the space it occupies and compliments the surrounding environment and area.]

### Water

33 [The amount and quality of water may be the most important component to this proposal. Water should be a priority when determining the size of the proposed development. The most vague and ambiguous language of this proposal is found in the sections of the DEIR/DEIS regarding water.]

34 [Insufficient data was submitted in the DEIR/DEIS to determine the accuracy and assumptions regarding the Madden Creek Water Company and its ability to satisfy demand were made without facts to support the statement. In fact, the DEIR states "No data is available from Madden Creek Water Company, but the current demand of 160 connections is being met and it can be *assumed* that the water supply is sufficient..." See DEIR, p. 15-27.] The added demand due to fire suppression requirements, larger demand to supply the proposed mass and scale of the project, snow making, etc. will create a shortage to existing residential customers of the Madden Creek Water Company. Also, what will happen to the community aquifer? Was this addressed in the DEIR/DEIS? No new source of water is being proposed by Homewood Mountain Resort for the Tahoe Ski Bowl Way proposed ninety nine (99) unit condominium project. 35 36 37

Where specifically will the additional supply for South Base water come from?]

38 [The existing north side buildings and snowmaking facility is, and has been, operating at maximum water capacity during snowmaking times. The proposed project lists several Assessor Parcel Numbers and water companies for possible sources of water for the proposed Hotel building and snow-making. One parcel named is located on the Tahoe Swiss Village beach, where a small non-operational 64 square foot pump house is located. The Tahoe Swiss Village Home Owners Association is currently engaged in a lawsuit with the Tahoe Swiss Village Utility Company, also doing business as Agate Bay Water Company, (same owner) regarding easement rights, and the proposal of a new 800 square foot pump house. The proposed pump house is more than twice the size needed to house the equipment used to supply the demand, based on existing working wells supplying subdivisions within the Lake Tahoe Basin. Is this an expansion planned by Tahoe Swiss Village Utility Company to supply Homewood Mountain Resort Ski Area with new increased water supply from this intake at the Tahoe Swiss Village beach?

Is Homewood Mountain Resort Ski Area involved in this lawsuit and interested in acquiring small independent water companies along the West Shore to satisfy the overburdening demand for a project that is completely oversized? ]

39 [Furthermore, the existing well behind the Maritime Museum adjacent to the Fawn St. parking lot where the parking structure is being proposed is not named as a source of water. ]

40 [I am personally concerned that in the case of a natural fire disaster, all our resources, water, fire department, sheriff, medical assistance, etc. will be diverted to the Hotel and adjacent project buildings. ] The DEIR/DEIS states, "The proposed project... have the potential to impede emergency responses on a temporary basis during construction, and permanently if adequate emergency vehicle access is not provided to and throughout the project area." DEIR/DEIS, p. 17-14. Additionally, the DEIR/DEIS states, "construction vehicles and equipment may block and/or slow through traffic in the surrounding area, especially along SR 89." DEIR/DEIS, p. 17-14. How does the proposed project address this problem? ] and where specifically is the increase in supply for the new water demands coming from? Why is Homewood Mountain Resort Ski Area not using the existing well, Quail Lake, or developing a water source on their property? These are concerns that need to be resolved prior to project approval. ] 41 42

#### Pollution and Noise

43 [The proposed construction will create large-scale construction traffic which will add cubic tons of carbon monoxide and dust pollution to the air, water, ground and lake clarity. ] The amount of waste-water, sewage, garbage, waste, fuel, carbon monoxide, etc. all could add a strain to the existing infrastructure and environment to the point of failure. ] 44

45 [The increase in noise due to construction, mechanical machinery and components, increased commercial truck delivery and pick up of various vendors and products, increased waste and garbage pick up, increased snow making and grooming, all add to the pollution and noise that will impact OUR community. ] With large developments, pollution and noise grow proportionally. The best solution for the problem is to down- 46

size the project to a sensible amount that is compatible with the community, infrastructure, and environment. Please consider the size of the Homewood community, and its ability to sustain and maintain this type and size of development. ]

### Traffic and Parking

47 [The duration of a project this size will impact the West Shore corridor with construction traffic for many years. The DEIR/DEIS states that "HMR anticipates a ten (10) year time frame for the build out of the Ski Area Master Plan." DEIR/DEIS p. 3-47. This heavy, large scale traffic will accelerate the deterioration of the existing roadway and drainage systems, which impact the full-time residents and community the most. ] The proposed 48 project does not clearly address the mitigation of traffic and parking. ] There are a limited 49 amount of skier parking spaces being proposed in a parking garage structure located behind the Maritime museum and limited underground parking. Why is there not a public park / bicycle riding hub in the location of the parking garage. Something like this is a true benefit to the community rather than a parking garage/structure. ]

50 [Many parking alternatives exist but Homewood Mountain Resort states that there are a limited amount of skier parking spaces. Therefore excess parking is supposed to take place off-site and skiers will be shuttled in. There were no specifics regarding the alternative parking areas, nor was there an explanation on the logistics of a shuttle system during peak times. ] I feel that there are other sensible alternatives to the parking issue. 51 Homewood Mountain Resort has other places on-site to create adequate parking rather than burdening neighboring areas or Tahoe City. ] The skier parking proposed for the 52 Hotel building is very limited. ] Also, the proposed valet system caters to few and slows 53 the traffic flow. ] The increase of regular commercial traffic to service Homewood causes a 54 problem by itself- this is not including the increased construction and visitor traffic. The negative impact from a development of this size for all who visit and live on the West Shore can not be ignored. ]

55 [Many of these traffic and parking challenges can be mitigated or solved if the project scaled down with various types of on site parking, sized for a realistic amount of skier and year around visitors. ]

### Conclusion

56 [The interests of the development lie in financial return, not the community and environmental benefit. The size and scale of this project is about return on investment- it is not in the best interests or health of the local Homewood community, West Shore, and the Lake Tahoe Basin as a whole. I am not against responsible development that is environmentally sensitive, has sound infrastructure, and is friendly and compatible with the surrounding community. My opinions are based on facts contained in the Homewood Mountain Resort Ski Area Master Plan Proposal Environmental Impact Report/Statement, information and facts from attending meetings and presentations, communication with Homewood Mountain Resort Ski Area staff, visitors, skiers, and many Lake Tahoe and Homewood area Home Owners and Associations. ]

51 [The proposed size and density of this project does not represent nor is it compatible with the Homewood community, character and the Tahoe Basin's best interests. Homewood is a small community- any development taking place must not exceed the overall scale of the area] and the area's ability to maintain the infrastructure and economics of the 58 development. Homewood is a community in need of updated infrastructure and limited, environmentally responsible development.] With a \$250 million construction budget, 59 comes a long construction schedule. Due to weather, the building season is limited, making the 10-year construction phase potentially even longer. This impact alone should be a concern to all. A problem with any project of this size and length of schedule is the ability to complete the project financially. I respectfully request construction and performance bonds be mandatory to assure phases of construction be guaranteed and completed in their entirety, in case of owner or contractor default, bankruptcy, or sale.]

60 [To conclude, living within your surroundings, becoming part of your environment, leaving a small foot print, living environmentally responsibly are all part of the Tahoe experience. This should not change because of somebody's idea of the potential for over-development. A proposal such as this should embrace the area and community, with community support, not opposition. There is TOO much opposition to this project as it is currently proposed, to allow it to proceed. The people of this area are few in numbers compared to the one sided marketing of this proposal. Please consider the local views and opinions. Because someone advocates an idea and has the resources to market that idea, does not make it right, or better.]

Sincerely,  
Keith D. Batory  
P. O. Box 1169  
Homewood, CA 96141

*K.D. Batory*



Microsoft Office Outlook Web Access

Type here to search

This Folder

Address Book

Options

Mail

Calendar

Contacts

Deleted Items

Drafts

Inbox (161)

Junk E-Mail

Sent Items

Click to view all folders

Manage Folders...

Reply

Reply to All

Forward

Move

Delete

Close

### JMA's Homewood project

Steve Baugh [steve.baugh@gmail.com]

Sent: Wednesday, February 23, 2011 10:14 PM

To: Homewood DEIS Comments

To whom it may concern,

Judging by the design of their new Homewood project and their actions in the past, I feel that JMA Ventures has proven to be very concerned about the wellbeing of Lake Tahoe and the environment around it. The TRPA would be hard pressed to find a better partner to achieve their goals of winning on both the environmental & economic fronts. I also truly fear what would happen if JMA were to give up on the redevelopment and sell the resort. That leaves the door open to lots of possibilities that could have a very negative effect on the environment as well as the economy.

Please put me down as one in favor of approving the Homewood Mountain Resort Ski Area Master Plan.

Thanks,

Steve Baugh

Steve Baugh  
P.O. Box 10488  
South Lake Tahoe, CA 96158  
530-544-1679 Office

Connected to Microsoft Exchange

Judy Nikkel

**From:** judy belding <beldingjudy@gmail.com>  
**Sent:** Monday, April 18, 2011 8:22 AM  
**To:** Judy Nikkel  
**Subject:** Homewood DEIS Comments

35

Judy Nikkel

Dear TRPA,

- 1 [Please do not add to congestion on Lake Tahoe.]<sup>2</sup> [Please do not change the "Tahoe" feel by adding more hotel units,  
 more shops]<sup>3</sup> [too many empty ones in nearby Tahoe City] & consider the 'run off' adding to Lake & the already <sup>5</sup>  
 congested road!]  
 6 [Leave Tahoe alone. Upgrade property don't add!]<sup>4</sup>

judy belding  
 39 lower crescent ave  
 sausalito , CA 94965

**Judy Nikkel**

---

**From:** Jennifer Bellinger <missjennl123@aol.com>  
**ent:** Monday, April 18, 2011 11:24 AM  
**To:** Judy Nikkel  
**Subject:** Homewood DEIS Comments

36

Judy Nikkel

Dear TRPA,

1 [The Westshore cannot sustain the JMA development plans for Homewood. The traffic impact alone will be detrimental to the environment...not to mention the overall expansion.] 2 [The mountain is too small to take on the plans.] 3 [Truth be told, the plans will improve the property values as there will be more business on the Westshore, but at what cost?] 4 [A scaled back version without all the large scale bells and whistles would be better. If JMA can cut back the plans by at least 25%, then I would support this project.] 5 [I am not opposed to progress and development, I just think those two moves need to be done responsibly, taking into consideration the full-time residents,] 6 [the issues with parkings,] 7 [the issues with space,] and JMA needs to come up with alternative transportation methods for the mountain.] 8

Jennifer Bellinger  
PO Box 223  
Tahoma, CA 96142

**Judy Nikkel**

---

**From:** Danielle Bendorf <daniellebendorf@gmail.com>  
**ent:** Monday, April 18, 2011 12:13 PM  
**To:** Judy Nikkel  
**Subject:** Homewood DEIS Comments

37

Judy Nikkel

Dear TRPA,

- 1 [ Protecting Old Tahoe is of the utmost concern to myself and my family. The West Shore is the very last stretch of highway around the entire lake where you can pass through the way things used to be, and this is SO valuable to us! South shore is obviously a mess of a tourist trap, North Shore is quickly becoming that way, and East Shore will thankfully always remain natural. This leaves West Shore as the only place around the lake where you can travel a few miles into the past, and we love this! ]
- 2 [ To redevelop Homewood would be another step in the wrong direction for those who truly love and care about Tahoe as she is, and not as some treasure pot that developers are trying to turn her into. ]

Danielle Bendorf  
Carnelian Circle  
Carnelian Bay, CA 96140

**Judy Nikkel**

---

**From:** Pierre Benoit <pbenoit@e-bbk.com>  
**ent:** Wednesday, April 20, 2011 12:31 PM  
**To:** Judy Nikkel  
**Subject:** Homewood DEIS Comments

38

Judy Nikkel

Dear TRPA,

I support the Homewood project. The objections raised by the League could (and have been) raised against any redevelopment in the Basin.

Thaoe not only lovers of the scenery and fresh mountain air but skiers, hikers, boaters, cyclists, etc., etc. These people are also entitled to consideration and decent accomodation.

Without fresh investment in upgrading the building stock around the lake that stock will continue to age, and decay and cause more damage to the environment than the kind of development proposed by Homewood. ]

Pierre Benoit

Pierre Benoit  
.1080 E. Honey Mesquite Dr.  
Scottsdale, AZ 85262

---

**From:** Bob Bense [mailto:bbense-wccc@cal.net]  
**Sent:** Wednesday, February 27, 2008 7:47 AM  
**To:** jnikkel@trpa.org  
**Cc:** Richard Brown  
**Subject:** Project Application for Homewood Mountain Resort

To Whom It May Concern:

I'm unable to attend the meeting today at 11:00 AM. However, if I were, I would be there in support of you approving the project application for Homewood Mountain Resort for the Community Enhancement Program.

I feel what JMA Ventures has planned and the ways they are going about the project for Homewood Mountain Resort is a win / win for the environment and the west shore communities of Lake Tahoe. The sooner JMA can start moving forward on this project the better!

Sincerely,

Bob Bense  
President  
Sugarpine Lakeside Homeowner's Association  
Tahoma, California

**Judy Nikkel**

**From:** charles berger <chuckordel@comcast.net>  
**ant:** Wednesday, April 20, 2011 1:51 PM  
**To:** Judy Nikkel  
**Subject:** Homewood DEIS Comments

40

Judy Nikkel

Dear TRPA,

1 [Way too much action for such a small area. 2 This project will decrease our property value] and [3 take away the serene peaceful environment we now enjoy.] 4 When is big big enough? 5 My wife Del and I share our cabin at 7132 5th ave. in Tahoma with eight other families and we enjoy it just as it is. We have two shares in a 12/12 cabin and we are guests about once a month. It is already very busy and hard to visit with any holiday tied to our weeks. 6 Please voice our STRONG disagreement with this project being approved.]

charles berger  
905 catalina ct  
roseville, CA 95661

**Judy Nikkel**

**From:** Heather Bervid <sharpies\_and\_safety\_pins15@yahoo.com>  
**ent:** Tuesday, April 19, 2011 4:15 PM  
**To:** Judy Nikkel  
**Subject:** Homewood DEIS Comments

41

Judy Nikkel

Dear TRPA,

1 [The project will worsen the already horrible traffic on the West Shore, 2 which will contribute to air pollution.] 3 [The Lake Tahoe basin is already violating standards for ozone, which is harmful to people, animals, plants, water quality, air quality, and the local climate.] 4 [This project is very large and will urbanize a part of Tahoe that is treasured for its serenity and natural beauty, taking from the West Shore exactly what makes it the place it is today.] 5 [The project should follow rules that all other property owners at Tahoe must follow.] 6 [The project wants to permanently change the rules for height, which will allow for taller development throughout Tahoe in the future, turning our alpine lake into something resembling the hillsides of the San Francisco Bay.] 7 [This project is so large that it will transform and define its surrounding community, rather than being defined by a community plan.] 8 [Any environmental benefits are far outweighed by the detrimental impacts of this project.]

Heather Bervid  
P.O. Box 307  
Tahoe Vista, CA 96148



Tahoe Regional Planning Agency  
Homewood CEP  
PO Box 5310 Stateline, NV 89449-5310

April 4, 2011

RECEIVED

APR 08 2011

ENVIRONMENTAL COORDINATION SERVICES

Maywan Krach  
Community Development Community Development Resource Agency  
Environmental Coordination Services  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

RE: Homewood Mountain Resort Development Comments and Concerns

Dear TRPA and Placer Co.,

My connection with Tahoe began when I was sixteen years old. My mother and I camped on the beach at Meeks Bay. This was in 1947. My next experience was in 1960. We came to Tahoe to experience scuba diving in the clear water. It was like looking off the top of a multi-storied building. We finally were able to be here full time in 1983. As a full-time local resident and business owner, I operated Cedar Crest Cabins, supplying housing to twelve locals. In 2007 the property was sold and I built the first straw bale house in the basin. This house is on the national green building tour.

1 My concern with the proposed development in Homewood is the overall size and scale. As a long-term Homewood resident I feel that the overwhelming size of this project is not compatible with the existing community character. 2 I am NOT opposed to the redevelopment of Homewood, however I am concerned about its mass. 3 Specifically, after reading the DEIR/S page 3-42 I was particularly concerned about the project height and the amendment being proposed. This excessive height will impact TRPA's scenic threshold. 4 In addition the proposed mid-mountain lodge will also impact this scenic threshold and the view from Highway 89 and the Lake. 5 What impact will this project have on our local view-sheds and community character?

6 Traffic is my next concern. The increase in traffic in an area that already experiences huge back ups is a nightmare we already deal with every summer and at peak winter times. 7 Highway 89 is ONLY a two-lane road and cannot accommodate more cars. 8 I have questions on the experimental program of parking cars off-site and shuttling persons to Homewood. How do we know if this will be successful in reducing miles of travel? What will happen when personal emergencies arise and people need to get to their car immediately? What will happen at 4 pm when everyone is trying to get back to their car?

9 On a different note as a Homewood community member residing nearby to the project I am concerned about construction truck traffic. The DEIR/S p. 11-81, table 11-24 notes that there will be between 146-192 truck trips per day for grading. This is A LOT of truck traffic for such a small road and quiet community.

<sup>10</sup> [Noise] and an <sup>11</sup> [increase in night lighting will be degrading to wild animal habitat] <sup>12</sup> [What kind of impact will the introduction of more lighting to the community have on nocturnal wildlife?]

- 13 [As advocate, owner and green building enthusiast I am disappointed to see that the South Base will not have LEED certification on its buildings. After reading p. 3-27 of the DEIR/S I am confused on why this will not occur? There is an increasing importance and need for environmentally conscience building. I would be pleased to see the South Base achieve its LEED certification.]

I hope you take my concerns and thoughts into consideration. Thank you.

Sincerely,

*Ruth Ellen Braly*

Ruth Ellen Braly

**Maywan Krach**

**From:** bbvb11@gmail.com on behalf of Vic and Barbara Brochard [bbvb@calalum.org]  
**Sent:** Thursday, March 31, 2011 2:13 PM  
**To:** Placer County Environmental Coordination Services  
**Subject:** Homewood Mountain Resort

43

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

To: Maywan Krach

March 31, 2011

Re: EIR for Homewood Mountain Resort

From: Barbara & Victor Brochard

6740 West Lake Blvd., Tahoma CA

1 [We are against allowing the proposed project to take place at Homewood Resort. 2  
 We are specifically against all alternatives except 2 and 4. 3] [The others are much too big for the area  
 and out of character for the West Shore neighborhood.]

3 [There will be a great increase in traffic on a two lane road already beyond capacity, as there is  
 currently summer queuing from the West Shore to Tahoe City.] [The proposed mitigations cannot 4  
 offset the demands of the increased population and vehicular trips to service them.] [There would be 5  
 significant problems with emergency services and evacuations due to the population and traffic  
 increases.]

6 [Completion of this project would contribute to the decreasing clarity of Lake Tahoe through, among  
 others, increased storm water runoff] and [pollutants falling into the lake from the emissions of the  
 increased traffic.] 7

8 [The size of the project is too big and the alternatives, except numbers 2 and 4, are window dressing,  
 barely making a dent in the size of the project.]

44  
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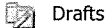
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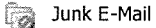
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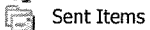
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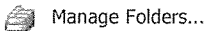


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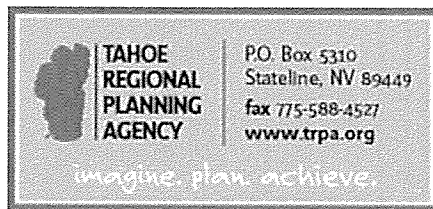
**FW: Homewood Mountain Resort Project**

David Landry

44

**Sent:** Tuesday, March 01, 2011 8:31 AM**To:** Homewood DEIS Comments**From:** Judy Nikkel**Sent:** Monday, February 28, 2011 8:59 PM**To:** David Landry**Subject:** FW: Homewood Mountain Resort Project

Judy Nikkel  
Clerk to the Governing Board  
Management Assistant  
775-589-5243  
775-588-4527-fax

**From:** Paul Brodie [mailto:pbrodie@Brocade.COM]**Sent:** Monday, February 28, 2011 7:38 PM**To:** Jeff Cowen; Judy Nikkel**Subject:** Homewood Mountain Resort Project

Jeff and Judy,

I wanted to drop you a quick note as a Homeowner in Tahoe Pines regarding the proposed project at Homewood Mountain Resort. I am in full support of this project moving forward as proposed. It will enhance the West Shore greatly and at the same time give us several upgrades that will enhance our lake and the environment for years to come. It is time we allow this project to move forward for all involved. If you would like to talk live with me please feel free to call me anytime.

Best regards,

Paul

Paul Brodie  
Homeowner  
4145 Madrone Ave  
Tahoe Pines, CA 96141  
Cell Phone – 408.876.7517

Connected to Microsoft Exchange

**Judy Nikkel**

---

**From:** Robert Brown <tobrown3@verizon.net>  
**ent:** Monday, April 18, 2011 4:05 PM  
**To:** Judy Nikkel  
**Subject:** Homewood DEIS Comments

45

Judy Nikkel

Dear TRPA,

Dear Stewards,

1 [Homewood (also known as Obexer City) does not need more development.]

2 [What it does need is better free access to the Lake for riders of public transit.]

Sincerely,

Robert Brown  
14 Upper Emerald Bay Road  
South Lake Tahoe, CA 96150  
530-544-1173

Robert Brown  
14 Upper Emerald Bay Road  
Upper Emerald Bay TraCT  
South Lake Tahoe, CA 96150

---

**From:** Stan Brown [mailto:rstanbrown@sbcglobal.net]  
**Sent:** Tuesday, February 26, 2008 1:43 PM  
**To:** Richard Brown  
**Subject:** FW: Feb. 27 TRPA Meeting

---

**From:** Stan Brown [mailto:rstanbrown@sbcglobal.net]  
**Sent:** Tuesday, February 26, 2008 1:42 PM  
**To:** 'jnikkel@trpa.org'  
**Subject:** Feb. 27 TRPA Meeting

To whom it may concern at TRPA:

1 I understand there will be a meeting tomorrow, February 27<sup>th</sup> to discuss the project applications for the Community Enhancement Program. I have attended various meetings regarding the proposed JMA Ventures project at Homewood Mountain Resort and would like to express my approval of the project.

My Family has owned property in Homewood since the 1930's and I personally have been a homeowner there since 1991.

2 The efforts JMA has made to satisfy the environmental, traffic, erosion, and fire control issues are commendable. I realize some development is necessary for us to preserve our own local ski mountain or else it cannot survive economically. JMA has proposed some small commercial development on the property which would allow us along the west shore to avoid many trips to Tahoe City or Truckee to buy the essential items we often require. This would eliminate excess traffic along Highway 89 and reduce emissions those trips would generate. While the word "development" is offensive to many, I am a true believer that if development is done correctly it can enhance the surrounding community.

3 I feel that JMA Ventures is making every effort it can to satisfy the concerns of their west shore neighbors in an effort to improve and develop Homewood Mountain Resort. For this reason, I encourage TRPA to allow JMA to continue with their current efforts and plans.

Sincerely yours,

R. Stan Brown

[Reply](#)[Reply All](#)[Forward](#)**Homewood DEIS Comments**

stevenson brown [sb.eng.resource@gmail.com]

47  
47

Flag for follow up. Start by Thursday, April 28, 2011. Due by Thursday, April 28, 2011.

**Sent:** Tuesday, April 19, 2011 8:21 AM**To:** Homewood DEIS Comments

Tahoe Regional Planning Agency  
Tahoe Regional Planning Agency  
Boulder Bay CEP  
PO Box 5310  
Stateline, NV 89449-5310  
US

Dear TRPA,

stevenson brown  
494 North St  
Willits, CA 95490

## Homewood Mtn Resort - comments

MARION BURROWES [mzburrowes@sbcglobal.net]

Sent: Tuesday, April 19, 2011 1:39 PM

To: cdraecs@placer.ca.gov; Homewood DEIS Comments

48

Homewood Mountain Resort development

Comments to Placer County and TRPA

From Marion Z Burrowes, 5690 Sacramento Ave, Homewood, CA 96141

530 525 7756 530 523 3400

Homewood Mountain Resort project:

1 [WAY TOO BIG. this will destroy the west shore quiet neighborhood feeling.] [Squaw,<sup>2</sup> Northstar, Kirkwood, Heavenly, Sugar Bowl, Diamond Peak, Mount Rose, Sierra at Tahoe - none of these were built and developed in a long-established neighborhood such as Homewood... and none are in the unique area as Homewood - adjacent to the Lake.]

3 [Tahoe area is overdeveloped] AND in addition to the extremely valid and stated  
4 [concerns of traffic,] [building heights,] [water,] [noise,] [pollution,] [huge<sup>8</sup> area of real estate  
development with more paved areas,] [this project will increase light<sup>9</sup>  
pollution despite claims of plans to use environmentally friendly lighting.] [Both<sup>10</sup>  
Squaw and Northstar are planning even more upgrades and development of their  
'destination resorts'. We need more?]

11 [Tahoe night sky is stunning. Visitors are amazed at actually seeing stars and the magnificent night sky visible here. This project will require lighting throughout the night.]

Each time TRPA/Placer County approve another project around the Lake, we lose more of our fabulous night sky visibility.]

12 [And please don't tell me again about the wonderful amenities like hardware store and ice cream parlor as is always stated at JMA presentations. Homewood's



last hardware store went out of business. Yes, people miss it but obviously not enough to have supported it and kept it solvent. T.City has hardware stores. A hardware store at the five-star hotel area complex is ludicrous.] Just where is the contractor/ homeowner going to park to run in and pick up a light bulb or number 2 nails? ]

14 [Homewood's south side will not be accessible for skiers as it will be paved over and covered with 100 condos - thus requiring everyone accessing the mountain to go through north area.. more foot traffic carrying skis, managing kids, just way more difficult to get on the mountain. Many folks have stopped going to N/star because of inconvenience of getting to the mountain.]

15 [AND presentations by JMA always state how much environment improvements have been made to the mountain, but never stated is that \$\$\$\$ grants from the govt have helped to finance these improvements.] Neither does JMA state the millions of \$\$\$ 16 made by selling to the Forest Service the Quail Lake area. They say they are losing \$\$\$ and if the project doesn't proceed, chances are the mountain will close.

**But this project isn't about the mountain and skiing. It is about real estate development.** JMA has the marketing expertise to present this as a positive and viable project to enhance (and "SAVE") the 'deteriorating' west shore.]

17 [I trust there will be timelines so that the upgrades to ski area, the mid-mtn lodge, the swimming pool and the 'special amenities just for the locals' will be constructed at same time as the real estate is being developed.

We know from other ski resort developments that the upgrades come AFTER the real estate is developed and sold]

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## TRAFFIC & SCOPE OF PROJECT

suzbuz@earthlink.net [suzbuz@earthlink.net] 49

Sent: Wednesday, February 23, 2011 2:00 PM

To: Homewood DEIS Comments

suzbuz@earthlink.net  
EarthLink Revolves Around You.

1 I am a full time resident of Tahoma for the past 23 years and feel the scope of this project is way too large for such a small rural community. I've seen how Homewood Mountain Resort handles holiday traffic by allowing illegally parked cars all along the highway creating a very hazardous situation where traffic is pinched down to a lane and a half with pedestrians everywhere. Motorists and pedestrians exchange obscenities while trying not to kill one another. I cringe to think of emergency vehicles trying to run this gauntlet.

2 All it would take is one car with a flat tire for full on chaos and obstruction of the one road serving West Shore. This past weekend (Presidents Day) is a perfect example of why this company cannot be trusted to deal with these issues. Having been involved in some form of land development for 30 years, I predict that JMA will build, sell and leave all the problems it creates in terms of vehicle trips and traffic congestion to the rest of the community to deal with into the future. I don't buy that erecting 350 units and a 7 story lodge is going to help this situation out. Without knowing for sure, it would appear that maximum skier count is dictated only by how many tickets can be sold rather than what the infrastructure can handle or how many people can be safely on the mountain.

3

4 It is the classic situation of a large, wealthy, corporation coming to a small ski town, paying menial wages and exploiting the community for its own profit. The highway is not designed to handle this type of traffic and part of each winter there is only one access due to closures at Emerald Bay. The scale of this development will create a division in this community and result in more gridlock and sprawl. While I don't oppose any development at all, the project should be reduced in scope to one of the smaller alternatives keeping more in line with the community as it exists now.

7

Tom Buswell

Connected to Microsoft Exchange

# Homewood DEIS Comments

Earl Byron [ebyron@ch2m.com]

Sent: Monday, April 18, 2011 9:07 AM

To: Homewood DEIS Comments

50  
50

Tahoe Regional Planning Agency  
Tahoe Regional Planning Agency  
Boulder Bay CEP  
PO Box 5310  
Stateline, NV 89449-5310  
US

Dear TRPA,

TRPA,

I must express my opposition to the permitting of the Homewood project on a number of grounds. This project would totally transform this area of the lake with a level of development and urbanization best reserved for either stateline, but not an area as "homey" as Homewood. Highway 89 in this area is NOT equipped to handle the traffic (nor the basin, the enhanced air pollution) and the congestion and growth would be a completely unwelcome change in character for the local community. Of course, the new development must adhere to strict construction and building standards designed to protect the lake, but the enhanced urbanization in the area and growth inducement far outweighs those benefits. Please consider opposing this development or severely scaling it back.

Thank you for your consideration.

Dr. Earl Byron

former Director, Lake Tahoe Interagency Monitoring Program, UC Davis (1980s).

Earl Byron  
CH2M HILL  
2485 Natomas Park Dr. Ste 600  
Sacramento, CA 95833

# Homewood DEIS Comments

Jessica Cadriel [jesterjess79@aol.com]

Sent: Tuesday, April 19, 2011 10:04 AM

To: Homewood DEIS Comments

51

Tahoe Regional Planning Agency  
Tahoe Regional Planning Agency  
Boulder Bay CEP  
PO Box 5310  
Stateline, NV 89449-5310  
US

Dear TRPA,

As a child of the Sierra Nevada and frequent, long-time visitor of Lake Tahoe I urge you, as stewards of this natural Gift from God, to save and protect it by rejecting the Homewood building project.

I support sustainable development that benefits the Tahoe Communities by improving the lives and livelihood of their residents and promotes equal opportunity and benefit for all. The Homewood building project is NOT that kind of development. It will cheapen the draw of the natural beauty, negatively impact the communities around it (instead of fitting into and being influenced by them), lower the quality of life for current residents and visitors by increasing traffic and urbanization, and result in negative impact on the fragile ecology of the area.

I urge you to not let short-term (and limited benefit) bottom-dollar outweigh the good stewardship and protection of a generational gift. Thanks for your time and consideration.

Jessica Cadriel  
1348 N 9th st  
Colton, CA 92324

52

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[Reply All](#)

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## Homewood DEIS Comments

William Callender [tahobil@aol.com]

**Sent:** Thursday, April 21, 2011 4:44 PM

**To:** Homewood DEIS Comments

Tahoe Regional Planning Agency  
Tahoe Regional Planning Agency  
Boulder Bay CEP  
PO Box 5310  
Stateline, NV 89449-5310  
US

Dear TRPA,

\ [ Please turn down the proposed expansion for the Homewood resort. It is simply too big

William Callender  
501 via casitas Apt. 1114  
San Rafael, CA 94904

MAR 18 2011

150 TAOE SKI BOWL WAY  
HOMWOOD, CA 94743

March 10, 2011

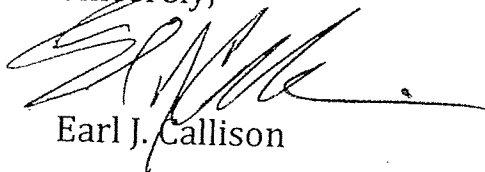
Dear Sirs,

The following comments respond to the Homewood Mountain Resort Ski Area Master Plan and Draft Environmental Impact Report/Environmental Impact Statement. I am a homeowner at 150 Tahoe Ski Bowl Way.

Under the Proposed Project (Alternative 1) the South Base area will be converted to a neighborhood residential area, which includes up to 99 residential condominiums spread throughout the South Base Area and 16 new townhouses, which require an extension and realignment of Tahoe Ski Bowl Way.

The proposed South Base Area improvements surround the existing eight homes on the section of Tahoe Ski Bowl way north of Homewood Creek. [Discretionary approvals for the project should include conditions, which require the applicant to fully, incorporate the existing eight homes into the neighborhood created by new development.] [Conditions should include improvements to the existing Tahoe Ski Bowl Way to make it consistent with the realignment and the road extension.] [All existing above ground utility lines should be undergrounded] [and road surface improvements should be made to be consistent with new road construction finishes.] [The existing eight homes should be offered the use of neighborhood amenities and privileges.] [The existing eight homes should be integrated into the 115 proposed new residences to create a feel of community rather than leaving an "island" between the areas of new development.]

Sincerely,



Earl J. Callison

150 Tahoe Ski Bowl Way  
Homewood, CA

**Judy Nikkel**

---

**From:** Patricia CAMPE <campejp@mac.com>  
**ent:** Monday, April 18, 2011 10:10 AM  
**To:** Judy Nikkel  
**Subject:** Homewood DEIS Comments

54

Judy Nikkel

Dear TRPA,

Please block Homewood development.

Profits for now for developer, problems with Tahoe residents and visitors will continue.

Patricia CAMPE  
1200 Lords Way  
Tahoe Vista, CA 96148

[Reply](#)[Reply All](#)[Forward](#)**Homewood DEIS Comments**

Jack CAMPE [campe@gmail.com]

**Sent:** Monday, April 18, 2011 10:17 PM**To:** Homewood DEIS Comments55  
55

Tahoe Regional Planning Agency  
Tahoe Regional Planning Agency  
Boulder Bay CEP  
PO Box 5310  
Stateline, NV 89449-5310  
US

Dear TRPA,

The Homewood project will be a disaster for our area.

Highway 89 is already at its peak.

Our lake is too precious to be sold out to developers.

Jack CAMPE  
1220 Lords Way  
Tahoe Vista, CA 96148



56

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homewood bike trail

Michael Carabetta [mcarabetta@gmail.com]

Sent: Thursday, February 10, 2011 5:09 AM

To: Homewood DEIS Comments

Can we please make sure that Homewood takes the responsibility to complete the bike path in front of their facilities and connect the bike trail that goes between Tahoe City and Sugar Pines.

With an increase in traffic that this development will produce it is imperative that a safe passage be created for bicyclists. It is a sin that this has not been corrected. We place children and adults in serious danger everyday dumping bicyclists onto the highway with not even a painted bike lane.

The state should be ashamed of itself - perhaps Homewood will solve the problem.